

# EXHIBIT

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DATE	ACTION	TIME	ATTY
June 6, 2010	Discussions with Joshua Fitch ("JF") re Schoolcraft case	0.80	JLN
June 18, 2010	Meeting w/ Gerald Cohen ("GC") and JF re: Schoolcraft coming to our office for interview	0.80	JLN
June 20, 2010	Read Voice articles on Schoolcraft	2.10	JLN
June 21, 2010	Read articles sent by Schoolcraft on Gerald Nelson	0.80	JLN
June 22, 2010	Discussion with GC and JF re Schoolcraft case & causes of action	0.80	JLN
June 23, 2010	Meeting w/ GC and JF re: GC's upcoming meeting w/ Schoolcraft	0.75	JLN
June 24, 2010	Initial client meeting & interview with AS in Johnstown	7.40	JLN
June 24, 2010	Traveled to Johnstown to meet prospective Client Adrian Schoolcraft (3.6)	1.80	JLN
June 24, 2010	Travel back to NYC (3.2)	1.60	JLN
June 24, 2010	TC with GC re: meeting w/Schoolcraft	0.40	JLN
June 25, 2010	Meeting w/ GC and JF re: scope of Schoolcraft materials that need to be reviewed for complaint, overall strategy & next steps for moving forward	3.25	JLN
June 25, 2010	Read Schoolcraft's PBA contract; took notes re: same	2.50	JLN
June 25, 2010	Meeting with GC & JF re: possible discovery demands after suit is filed and general strategy	1.40	JLN
June 25, 2010	Reviewed transcript of Polanco tapes; took notes re: same	0.40	JLN
June 25, 2010	Sent GC information for retainer; forwarded retainer to AS; forwarded signed retainer back to GC	0.10	JLN
June 26, 2010	Reviewed Schoolcraft's records from Jamaica Hospital Medical Center; took notes re: same	3.25	JLN
June 28, 2010	Discussion with JF and GC re retainer & meeting with Schoolcrafts	1.25	JLN
June 28, 2010	Discussion with JF re meeting with P.O. Velasquez re policy of quotas	0.90	JLN
June 28, 2010	Discussion with JF & Adrian Schoolcraft (AS) re prior counsel Jonathan Moore	0.30	JLN
June 28, 2010	Memo re: Eddie Velasquez	0.30	JLN
June 28, 2010	Review of correspondence w/Jonathan Moore re: AS	0.10	JLN
June 29, 2010	Listened to "home invasion" recording from Oct. 31 multiple times; took notes re: same	2.60	JLN
June 29, 2010	Meeting w/ GC and JF re: PBA materials for use in Schoolcraft	1.25	JLN
June 29, 2010	Review of 75th Pct arbitration decision	0.90	JLN

June 29, 2010	Discussion with JF & GC re decision on PBA arbitration case	0.40	JLN
June 29, 2010	Drafted correspondence to Jonathan Moore	0.30	JLN
June 29, 2010	Correspondence w/ GC re: Jonathan Moore substitution	0.20	JLN
June 29, 2010	Discussion with JF & GC re substitution of counsel Moore	0.20	JLN
June 29, 2010	E-mail exchange GC re: Schoolcraft matter	0.20	JLN
June 29, 2010	E-mail exchange with AS re: 911 calls and getting copies of same	0.10	JLN
June 29, 2010	E-mail from GC re: Stop and Frisk case	0.10	JLN
June 29, 2010	E-mail to GC re: Stop and Frisk case	0.10	JLN
June 30, 2010	Listened multiple times to call from LS to Capt. Lauterborne re: "City wide" search for AS; took down best quotes from same for possible inclusion in complaint .	1.40	JLN
June 30, 2010	Listened to call from AS to IAB on Oct. 31; took notes re: same	0.70	JLN
June 30, 2010	Reviewed composite file of materials on Cmr. Julie Schwartz compiled by AS	0.60	JLN
June 30, 2010	Discussion with JF & GC re FOIL requests for 911 calls & how to proceed	0.50	JLN
June 30, 2010	Reviewed FOIL requests for 911 calls made by AS to NYPD and discussed with JF	0.30	JLN
June 30, 2010	Reviewed PBA quota affidavit	0.10	JLN
July 1, 2010	Started listening to day tour recording by AS made on Oct. 31, 09; took notes on same.	3.40	JLN
July 1, 2010	T/c w/AS re: specific details of events alleged in Aug. 20, 2009 UF 49 re: Caughey/Weiss	1.30	JLN
July 1, 2010	Listened to recording of conv. w/ PAA Monique Carter from Aug. 16, 09, (re: removal of personnell files from office by Caughey/Weiss); took notes re: same	0.70	JLN
July 1, 2010	Reviewed UF 49 dated Aug. 20, 2009 from AS to C. Campisi (Chief IAB)	0.20	JLN
July 1, 2010	Reviewed UF 49 from AS to Campisi dated Jan. 12, 2009 re: allegation of sexual misconduct by prisoner	0.20	JLN
July 2, 2010	Finished listening to day tour recording made by AS of Oct. 31, 09; made notes re: same	4.20	JLN
July 2, 2010	Reviewed media stories & news articles provided by AS; notes re: same	4.20	JLN
July 2, 2010	Discussion with JF re AS' ability to pursue claim under Labor Law 215-a	0.60	JLN
July 4, 2010	Read e-mails from A. Schoolcraft re: articles on Mauriello and Palestro	0.25	JLN

July 5, 2010	Reviewed composite file on Paul Browne, incl. prior testimony in another action, as put together by AS; took notes re: same	2.40	JLN
July 5, 2010	Reviewed composite file on Ray Kelly prepared by AS; took notes re:same	1.60	JLN
July 5, 2010	T/c AS re: Palesto, Daily News Contact, trip to NYC and news interviews	1.20	JLN
July 5, 2010	Reviewed memo showing contact between Lt. Caughey & Lt. R. Lee at Early Intervention Unit ("EIU")	0.10	JLN
July 6, 2010	Meeting with JF/GC re: progress/developments on the case, meeting in NYC on Wednesday and filing of lawsuit;	1.75	JLN
July 6, 2010	Meeting w/ GC and JF re: new whistleblower who contacted GC re: Schoolcraft	1.30	JLN
July 6, 2010	T/c Len Levit re: his knowledge of NYPD & thoughts about case	0.50	JLN
July 6, 2010	T/c R.P. (Daily News reporter) re: AS case;	0.50	JLN
July 7, 2010	Listened multiple times to recording between AS & Capt. Lauterborne re: "devil you know", "Mr. Community" etc.; took notes re: same	3.40	JLN
July 7, 2010	Reviewed Schoolcraft documents, evals, memos, letters to PBA, letters to Mauriello	2.70	JLN
July 7, 2010	Meeting w/ AS, LS re: Rae Koshetz (Attorney for charges and specifications) and options for fighting NYPD	2.00	JLN
July 7, 2010	Meeting w/ AS prior to group meeting later today	1.50	JLN
July 7, 2010	Discussion with JF re Labor Law research	0.80	JLN
July 7, 2010	Meeting with AS, LS, JF & GC	0.75	JLN
July 7, 2010	Meeting with JF and GC re Schoolcraft Meeting and tapes;	0.50	JLN
July 7, 2010	T/c AS/LS and Hampton Inn re: authorization for cc; fax letter re same	0.25	JLN
July 8, 2010	Started review of CD Recordings (2008 roll calls) provided by AS; took notes re: same	3.70	JLN
July 8, 2010	Listened to Oct.28, 2009 recording of conv. b/w AS and Sgt. Devino at PBBN regarding status of plaintiff's appeal; notes re: same	1.20	JLN
July 8, 2010	T/c with LS regarding status of move and discussions with landlord Stretmoyers (witnesses)	0.25	JLN
July 8, 2010	Read tribute to Mauriello praising effectiveness in crime reduction	0.10	JLN
July 8, 2010	Reviewed UF 49 from AS to DI Brower (former CO 81) re: forced overtime	0.10	JLN
July 9, 2010	Continued listening to 2008 Roll Call recordings; notes re: same.	6.40	JLN

July 9, 2010	Discussion with JF re timeline	1.10	JLN
July 9, 2010	Drafted bullet pt time line summarizing critical events in Schoolcraft case	1.00	JLN
July 9, 2010	T/c AS re status of move, discussions with landlord (eyewitness) and additional docs located at apt.	0.75	JLN
July 9, 2010	Reviewed PG Guide 314-11- re: appeals of evaluation; took notes re: same	0.40	JLN
July 12, 2010	Listened to recording of appeal meeting on Feb. 25, 2009; replayed and took notes re: same	3.40	JLN
July 12, 2010	T/c AS re QAD interviews and PBA letter re: illegal quotas	0.75	JLN
July 12, 2010	Reviewed memo from Lt. Mascol re: TS operators not to speak with complainants	0.10	JLN
July 13, 2010	Review of additional Schoolcraft recordings; took notes re: same	4.20	JLN
July 13, 2010	Reviewed recording of conv. b/w AS & Lt. Mascol on Feb. 20, 2009; took notes re: same	0.60	JLN
July 13, 2010	Reviewed FDNY PCR for AS; took notes re: same	0.50	JLN
July 13, 2010	T/c Rae Koshets re: status of Schoolcraft matter & pending charges & speed	0.50	JLN
July 13, 2010	Listened to recording b/w AS & Det. Peterson on Sept. 13, 2009	0.40	JLN
July 13, 2010	T/c RP re: Frank Palestro	0.25	JLN
July 14, 2010	Reviewed multiple NYPD performance evaluation guides provided by pltf, including guides for Detectives & P.O.'s, for P.O. Det. Specialists; took notes re: same	3.80	JLN
July 14, 2010	Meeting w/ GC and JF re: Schoolcraft complaint & next steps for moving forward	1.25	JLN
July 14, 2010	T/c Eric Sanders, Esq., re: Frank Palestro & PO Minaya & possible joint participation in each others cases	0.25	JLN
July 14, 2010	Reviewed document re: conversation b/w Lt. Mascol & Schoolcraft on Jan. 14, 09 re: need for more "activity"	0.20	JLN
July 15, 2010	Review of Schoolcraft recordings (2008 roll calls)	3.10	JLN
July 15, 2010	Discussion with GC and JF re tapes	1.10	JLN
July 15, 2010	Reviewed AS's evaluation for Sept. 2009 (by Sgt. Stukes & Mauriello) re: Pltfs' "poor activity" & how he was "counseled" re improvement; took notes re: same	0.50	JLN
July 15, 2010	Reviewed AS evaluation for April 2009 noting "poor activity" & AS's unwillingness to meet "performance standards" of NYPD	0.40	JLN

July 15, 2010	Reviewed Brown & Gropper letter to Mauriello re: appealing evaluation & numerical calculations of performance vs. actual rating, etc; took notes re: same	0.40	JLN
July 15, 2010	Reviewed PG 205-56 and PG 205-57 re: P.O.s' monthly/quaraterly performance reviews; took notes re: same	0.30	JLN
July 15, 2010	Reviewed AS Meritorious Police Duty Medal	0.10	JLN
July 15, 2010	Reviewed ltr from AS to Senator Hugh Farley requesting assistance	0.10	JLN
July 15, 2010	Reviewed UF 49 from AS to Mauriello dated 9/2/09 re: appeal of his evaluation	0.10	JLN
July 16, 2010	Continued listening to recordings (appeal meeting; Mascot conversation; Lauterborn Duty Captain incident); took notes re same.	5.40	JLN
July 16, 2010	Continued review of Schoolcraft recordings (2008 roll calls)	3.40	JLN
July 16, 2010	Meeting with GC re: Schoolcraft issues and status of complaint & overall strategy	1.25	JLN
July 16, 2010	Reviewed composite file on Brandon Del Pozzo (former CO of 50 Pct);	1.20	JLN
July 16, 2010	T/c AS re: Eric Sanders conversation and status of hard drive retrieval	0.75	JLN
July 16, 2010	Rev'd Admin. Guide procedure 303-20 re: steps to be followed for an appeal; notes on same.	0.20	JLN
July 16, 2010	Rev'd pltf's ltr on July 31, 2009 to PBA gen. counsel & summarizing events to date & seeking PBA representation	0.20	JLN
July 16, 2010	Reviewed PBA letter (Aug. 17, 09) in response to AS's request for legal representation from PBA	0.10	JLN
July 17, 2010	Listened to 3 different recordings of interviews by Lamstein (NYPD Psych); took notes re same:	3.40	JLN
July 17, 2010	Reviewed 81st Pct Chart regarding monthly self-inspections for 2009; notes re: same	0.30	JLN
July 17, 2010	Reviewed photos of 81st precinct as provided by AS; flagged photos most relevant for case & created list of same.	0.30	JLN
July 17, 2010	E-mail exchange with AS re: UF 250's	0.10	JLN
July 19, 2010	Review of Schoolcraft roll calls (2009 roll calls); notes re: same	4.20	JLN
July 19, 2010	Listened to recording b/w LS & FBI Special agent on Nov. 9, 2009 requesting fed. Investigaiton into what happened to AS	0.30	JLN
July 20, 2010	Continued review of Schoolcraft roll calls (2009); took notes on same	3.90	JLN
July 20, 2010	T/c with AS regarding case status	0.50	JLN

July 21, 2010	T/c call b/w AS, JN&LS re: GR information and Del Pozzo "offer" & new officer fired b/c if quotas	2.10	JLN
July 21, 2010	Conference call b/w Graham Raymond ("GR") GR & AS & LS re call by NYPD to GR	1.20	JLN
July 21, 2010	T/c GR re NYPD contact by Brandon Del Pozzo re Schoolcraft employment issues	0.25	JLN
July 22, 2010	Continued review of Schoolcraft recordings (2009 roll calls)	3.10	JLN
July 22, 2010	T/c AS re Del Pozzo, GR & letters to Stuart London	1.10	JLN
July 22, 2010	T/c JF/GC re updates on Schoolcraft	0.50	JLN
July 22, 2010	E-mail exchange with AS re: council speaker wants CCRB to try its own cases	0.10	JLN
July 26, 2010	Meeting with JF & GC re case & updates on Brendan Del Pozo	2.10	JLN
July 26, 2010	Meeting JF/GC re issues for Schoolcraft complaint	1.00	JLN
July 26, 2010	Discussion with GC & JF re complaint draft next steps moving forward	0.60	JLN
July 26, 2010	T/c Larry Schoolcraft re: Del Pozzo e-mail GR & PBA letter to Stuart London	0.60	JLN
July 26, 2010	Discussion w/ GC re Brandon del Pozo	0.30	JLN
July 26, 2010	T/c w/ GR re: new rookie (PO Chris Bienz) fired b/c of quota	0.30	JLN
July 26, 2010	Sent E-mail to GC re: Del Pozo	0.10	JLN
July 27, 2010	Meeting w/AS, GC, JF to prep for discussion with US attorneys office EDNY	3.25	JLN
July 27, 2010	Meeting w GC and JF to discuss complaint	1.25	JLN
July 27, 2010	Mtg GC re draft of complaint and proposed revisions	0.75	JLN
July 28, 2010	Discussion with JF and GC re: Adhyl Polanco and other whistleblowers	0.50	JLN
July 28, 2010	Discussion with JF re complaint (proposed areas for improvement)	0.40	JLN
July 28, 2010	E-mail to JF re meeting with Polanco/Raymond & Rocco	0.10	JLN
July 28, 2010	Reviewed AS Certificate of Completion of Police Academy	0.10	JLN
July 28, 2010	Reviewed UF 49 from Sgt. Meyer (81) re: shooting in confines of 81 Sept. 2009	0.10	JLN
July 29, 2010	Reviewed NY AG's investigation into NYPD's Stop & Frisk Practices & Statistical Review of NYPD's UF 250 data, as provided by AS; took notes re: same	2.80	JLN
July 29, 2010	Meeting with JF and Rocco P – Daily News re Schoolcraft and evidence of quotas for Monell claim	1.50	JLN



July 30, 2010	Meeting with JF, GC, Polanco & Raymond re: Schoolcraft & Monell claim	3.25	JLN
July 30, 2010	Continued edits and revisions to complaint	3.20	JLN
July 30, 2010	Meeting with JF and GC re: changes & additions to complaint	1.20	JLN
July 30, 2010	Read Judge Beinstock's decision in PBA Velez arbitration; took notes re: same; extracted language for use in complaint	0.60	JLN
July 30, 2010	Reviewed docs re: NYC Safety Restraint Enforcement Program, from Sept. 11-14 '09 for increased summons activity	0.30	JLN
July 30, 2010	Reviewed Boro Daily Impact OT Form	0.10	JLN
July 31, 2010	Cont'd review of Schoolcraft tapes and timeline chart	3.10	JLN
July 31, 2010	Continued edits/revisions of complaint	2.80	JLN
July 31, 2010	E-mail from JF re edited complaint	0.10	JLN
August 1, 2010	T/c w/AS & LS re: Fulton Cty decision & current status of public benefits & continued processing of Dec. 9, 09 application for benefits	1.10	JLN
August 1, 2010	Reviewed Fulton County Decision after Hearing (6-9-10) reversing agency's decision that AS voluntarily ended NYPD employment; took notes re: same	0.80	JLN
August 2, 2010	Further edits revisions & additions to complaint	3.20	JLN
August 2, 2010	Reviewed original Notice of Claim filed by AS	0.10	JLN
August 3, 2010	Edited complaint and sent to JF for review	1.60	JLN
August 3, 2010	Meeting w/ GC re: Schoolcraft complaint and other whistleblower police officers to possibly include in complaint	0.50	JLN
August 3, 2010	Compose E-mail to JF with detailed edits for the revised Complaint	0.40	JLN
August 3, 2010	Discussion with JF re corrections	0.30	JLN
August 3, 2010	Reviewed memo from Lt. Ragnello (81Cdr. 3rd Platoon) re: creating Crime Reduction Unit at 81	0.30	JLN
August 3, 2010	Reviewed Schoolcraft UF 49 re: Lt Jones (filed in June 07)	0.30	JLN
August 3, 2010	Discussion with JF re corrections to complaint	0.25	JLN
August 3, 2010	E-mail exchange with JF re Revised complaint	0.10	JLN
August 4, 2010	Review of AS chronology for complaint; incorporated same	1.40	JLN
August 4, 2010	Further edits and revisions to complaint	1.20	JLN
August 4, 2010	Read AS memo re: Brandon Del Pozo	0.20	JLN
August 4, 2010	E-mail exchange JF re complaint edits	0.10	JLN
August 5, 2010	Review of AS's August and March 09 recordings transcribed from Legal Language; took notes re: same	3.50	JLN



August 5, 2010	E-mail exchange with JF re: clarification of some factual issues in the complaint	0.20	JLN
August 6, 2010	Reviewed June 2009 roll calls, Halloween night and visits to Johnstown recording transcripts and discussed same with JF	3.80	JLN
August 6, 2010	Review of revised complaint from JF: made edits and revisions to same	2.10	JLN
August 6, 2010	Continued review transcriptions of August 2009 logs	1.40	JLN
August 6, 2010	E-mail exchange with JF re community visits	0.20	JLN
August 6, 2010	E-mail from JF re: complaint revisions	0.10	JLN
August 7, 2010	Continued review transcriptions of March 2009 logs	1.80	JLN
August 7, 2010	E-mail exchange JF re explanation of community visits	0.25	JLN
August 8, 2010	Reviewed transcription of December 2008 logs of roll calls; notes re: same	3.60	JLN
August 8, 2010	Discussion with JF re edits to complaint	0.40	JLN
August 8, 2010	E-mail to JF with additional allegations for complaint	0.10	JLN
August 8, 2010	Review of E-mail re: revision of Schoolcraft complaint	0.10	JLN
August 9, 2010	Meeting with AS to finalize complaint	2.70	JLN
August 9, 2010	Meeting w/GC and JF re: Schoolcraft website to support <u>Monell</u> theory	1.50	JLN
August 9, 2010	E-mail from JF re final draft of complaint; reviewed same	1.25	JLN
August 9, 2010	Review of final draft of AS complaint to be filed	0.50	JLN
August 9, 2010	Discussion with GC and JF re Adrian interview	0.30	JLN
August 9, 2010	E-mail to JF re negligent ret. claim	0.30	JLN
August 9, 2010	Review of legal issues re: Negligent hiring claim	0.30	JLN
August 9, 2010	Reviewed fax from anonymous PO re: Marino's quota system	0.10	JLN
August 10, 2010	Began review of new CD from Client w/ numerous additional recordings and docs	3.70	JLN
August 10, 2010	Listened to Brian Lehrer show (podcast) re: Schoolcraft allegations	0.50	JLN
August 10, 2010	Reviewed transcript of excerpts that refer to "Mauriello Specials", as provided by AS	0.50	JLN
August 10, 2010	Review of Articles about Schoolcraft complaint	0.40	JLN
August 10, 2010	Discussion with JF & GC re articles and possible typo in complaint	0.20	JLN
August 10, 2010	Reviewed GC draft of Schoolcraft website content	0.20	JLN
August 11, 2010	Meeting with PO Kevin Rodriguez 52nd Precinct	2.75	JLN
August 11, 2010	Discussion with GC re anonymous P.O. re: quota/retaliation	0.30	JLN

August 11, 2010	Review post of anonymous P.O. who contacted website re recording Mauriello	0.20	JLN
August 12, 2010	Reviewed transcription of Jan 2009 logs; notes re: same	2.90	JLN
August 12, 2010	Reviewed PBA by-laws and const.	0.90	JLN
August 12, 2010	Meeting w/JF and GC re: legal strategies on Monell and whistleblower cop contacts	0.80	JLN
August 12, 2010	Meeting w/GC and JF re: legal strategies & next steps for moving forward	0.50	JLN
August 13, 2010	Read Eterno & Silverman's article on Compstat ("Compare Statistics or Compose Statistics"); took notes re same	0.70	JLN
August 13, 2010	Discussion with GC & JF re Jonathan Moore Cease & Desist letter	0.40	JLN
August 14, 2010	Tc w/AS & LS re: Eterno & Silverman as possible expert witnesses and re: specific issues raised in their Compstat article	1.20	JLN
August 15, 2010	Internet research on Eterno/Silverman studies & articles & on Compstat	2.20	JLN
August 15, 2010	Meeting with JF and GC re NY Times story about quotas & Schoolcraft	0.60	JLN
August 16, 2010	Continued review of new CD from client	4.10	JLN
August 16, 2010	Interview of J. Ferrera (former Lt. at 81st Pct.)	3.40	JLN
August 16, 2010	Read CCRB Report on 75th & 81st Pcts, as provided by AS; took notes re: same	1.20	JLN
August 16, 2010	Travel back to NYC (1.40)	0.70	JLN
August 16, 2010	Travel to Long Island to meet Ferrara (1.2)	0.60	JLN
August 16, 2010	Read articles about NYPD's gun buy-back program provided by AS	0.30	JLN
August 17, 2010	Meeting with Eterno & Silverman	2.3	JLN
August 17, 2010	T/c w/AS & LS re: charges & specs, underlying facts relating to each charge, & best way to challenge charges in the NYPD trial room	1.40	JLN
August 17, 2010	Discussion with GC and JF re anonymous e-mails that we got as a result of the website	0.40	JLN
August 17, 2010	Travel back downtown (.80)	0.4	JLN
August 17, 2010	Travel uptown to meet Eterno & Silverman in midtown (.80)	0.40	JLN
August 17, 2010	Reviewed NYPD Charges & Specs against AS; created bullet point summary of same	0.20	JLN
August 18, 2010	Reviewed Relevant PG Sections for Charges & Specs (PG 203-03, 203-10, 203-18, 205-47); took notes re: same	1.75	JLN
August 18, 2010	Reviewed AS Quarterly Performance report from 08; took notes re: same	1.60	JLN

August 18, 2010	T/c w/AS & LS re: my reivew of PG sections relating to charges & specs, & best args. for challenging same	0.90	JLN
August 18, 2010	Discussion with JF re Rocco's story in Daily News	0.25	JLN
August 19, 2010	Finished review of new CD recordings and documents from client; took notes re: same	2.90	JLN
August 19, 2010	Discussion with JF and GC re: new recordings and documents provided by AS	1.25	JLN
August 19, 2010	T/c w/AS and LS re: chronology of events & questions relating to specific entries	1.10	JLN
August 19, 2010	Reviewed AS's chonology of chain of events leading up to Halloween night, starting with discussion w/Lt. Delafuente on Jan. 29, 09 (AS should "work for ASPCA")	0.70	JLN
August 19, 2010	E-mail from P.O. Chris Whitehead worked under Marino in 75th Pct.	0.10	JLN
August 20, 2010	T/c w/Chris Whitehead re: quotas at 75th Pct. & retaliation	0.90	JLN
August 20, 2010	Interviewed Marc Johnson, Ph.D., re: possible use as expert for psych claims	0.60	JLN
August 22, 2010	Meeting with JF & GC re whistleblowers reaching out through the website	0.80	JLN
August 22, 2010	Reviewed notes from AS activity log from Jan. 09 to March 09	0.70	JLN
August 22, 2010	Reviewed memorandum "Your Right to Know" provided by AS and released by NY State re: Public Officer Law & FOIL requests.	0.40	JLN
August 22, 2010	E-mail exchange with AS re: Internet search results on Dr. Lamstein and previous Cheroff case	0.20	JLN
August 23, 2010	Reviewed NYPD "Critical Objectives" & statistics re: index crimes, as	1.20	JLN
August 23, 2010	Reviewed Investigations Unit comment sheet provided by AS re: Sgt. Defabizio & contacts with Schoolcraft	0.20	JLN
August 24, 2010	Mtg. w/Chris Whitehead (P.O. 75 Pct.)	2.40	JLN
August 24, 2010	Reviewed AS videos & audio recordings & photos re: "Harassment & Stalking" by NYPD & Johnstown PD in upstate NY; took notes re: same	2.40	JLN
August 24, 2010	T/c w/AS & LS re: harassment by NYPD & Johnstown PD, interactions with NYPD during visits, and specific questions relating to what is shown on videos	1.30	JLN
August 24, 2010	Travel to L.I. to meet Chris Whitehead (1.20)	0.60	JLN
August 24, 2010	Travel back to NYC from meeting with C. Whitehead (1.40)	0.40	JLN

August 25, 2010	Meeting w/GC and JF re: ACC assigned, Schoolcraft Initial Disclosures	1.75	JLN
August 25, 2010	Reviewed Rand Report provided by AS re: "Analysis of Disparities" of NYPD's Stop, Question & Frisk practices; took notes re: same	1.20	JLN
August 25, 2010	Meeting with JF & GC re more whistleblower email & meeting with P.O. Fioranelli	0.90	JLN
August 25, 2010	Reviewed NYC Bar Ass'n Statement on NYC Stop & Frisk Practices; took notes re: same	0.80	JLN
August 25, 2010	Meeting with JF & GC re: Whitehead mtg.	0.75	JLN
August 26, 2010	Meeting with JF and GC re: interview of PO from 81st precinct "PF" re: corruption	1.50	JLN
August 26, 2010	Correspondence w/GC re: Frank Serpico	0.20	JLN
August 27, 2010	Read articles by Eterno & Silverman re: Compstat	1.50	JLN
August 27, 2010	Discussion with GC & JF re having Eterno & Silverman as experts	0.60	JLN
August 29, 2010	Discussion with GC re: Walter Lipscomb interview	0.50	JLN
August 30, 2010	Meeting with JF & GC re Garcia (cop from 81 who knows Schoolcraft & has info on quotas)	1.25	JLN
August 30, 2010	Meeting with JF & GC re Labor & Employment case & 12(b)(6) motion	0.50	JLN
August 30, 2010	E-mail correspondence w/GC re: MG (PO in 81st precinct)	0.10	JLN
August 30, 2010	E-mail w/ GC re: ACC Donna Canfield	0.10	JLN
August 30, 2010	Reviewed Notice of Appearance by Donna Canfield ("DC") on behalf of The City Of New York	0.10	JLN
August 31, 2010	Conversation with GC and JF re: topics to be discussed/disclosed with Mark Toor in Chief article	0.25	JLN
September 1, 2010	Meeting w/GC and JF re: discuss anonymous POs contacting us and how they can help Schoolcraft w/ <u>Monell</u> claim	1.80	JLN
September 3, 2010	Meeting with JF and GC to discuss information provided by DH, MG, EB (whistleblower cops) in furtherance of the <u>Monell</u> claim	1.40	JLN
September 3, 2010	Meeting w/ GC re: THEE RANT post to get officers to contact us on Schoolcraftjustice.com to support <u>Monell</u> claim	0.50	JLN
September 3, 2010	Discussion with JF re AS interview with This American Life	0.40	JLN
September 3, 2010	E-mail w/GC re: THEE RANT post	0.20	JLN
September 3, 2010	E-mail w/ GC re: This American Life Radio show	0.10	JLN
September 4, 2010	Reviewed PG section 216-05 (EDPS), notes re: same	0.40	JLN

September 5, 2010	Reviewed indictment of Sgt. Stukes (AS Supervisor) filed in Kings County	0.10	JLN
September 6, 2010	Discussion with JF re amended complaint	0.40	JLN
September 6, 2010	E-mail exchanges with Joseph Ferrara (former Lt. 81 pct)	0.20	JLN
September 7, 2010	Listened to recording of mtg b/w AS and Stuart London PBA Attorney re: appealing evaluation & options available	0.50	JLN
September 7, 2010	Reviewed Defendant Isakov's answer to complaint	0.30	JLN
September 7, 2010	E-mail exchange with Joseph Ferrara	0.10	JLN
September 7, 2010	Reviewed Aff of Service by defendants Jamaica Hospital Medical Center.	0.10	JLN
September 7, 2010	Reviewed defendant JHMC's corporate disclosure statement	0.10	JLN
September 7, 2010	Reviewed defendants answer to complaint filed by Jamaica Hospital Medical Center	0.10	JLN
September 10, 2010	Reviewed letter addressed to Judge Sweet from DC dated 9/1/2010 Requesting a sixty day extension	0.10	JLN
September 12, 2010	Reviewed "Crime, Police & the Community" report by Citizens Crime Commission, as provided by AS	0.80	JLN
September 12, 2010	Reviewed "Police & Public Safety in NYC" report from Citizens Crime	0.70	JLN
September 12, 2010	Reviewed Opinion/Order of Joan Lobis (JSC NY County) re: Ray Kelly under Article 78, as provided by AS	0.40	JLN
September 13, 2010	T/c w/AS re: salary with NYPD, benefits, and overall lost earnings claim	0.90	JLN
September 13, 2010	Reviewed NYC pay statements for AS from Nov. 13 '09, Oct. 30 '09, Feb. 5, 2010, June 4, 2010 (for "prior to separation" work)	0.30	JLN
September 13, 2010	Reviewed Notices of Claim filed by AS for "Property Loss" and "Salary Loss"	0.20	JLN
September 15, 2010	Reviewed Dep. of Eddie Valasquez (P.O. punished for not meeting quota); took notes re: same	1.20	JLN
September 15, 2010	Reviewed defendant Bernier's endorsed stipulation extending time to answer	0.10	JLN
September 16, 2010	Reviewed Floyd depositions from Floyd Proceedings, including Mauriello Dep., Donald McHugh Dep.; Angel Herran Dep, and Paul Browne dep.; took notes re same.	4.25	JLN
September 17, 2010	Meeting with JF and GC regarding information obtained from Floyd litigation and its impact on Schoolcrafts Monell and Retaliation claims	1.30	JLN

September 17, 2010	Started review of transcript from Velez proceedings; took notes re: same	0.60	JLN
September 18, 2010	Reviewed NYPD Admin guuide provided by AS; took notes re: same	1.20	JLN
September 18, 2010	Conversation with GC & JF re new whistleblower cop	0.30	JLN
September 18, 2010	Correspondence w/ GC re: anonymous Schoolcraft post	0.20	JLN
September 19, 2010	E-mail exchange w/ J. Ferrara re: Browne's reaction to Quota Tapes	0.10	JLN
September 20, 2010	Discussion with JF re meeting with DOJ on AS case	0.40	JLN
September 20, 2010	Discussion with GC & JF re media upload to website	0.20	JLN
September 22, 2010	Meeting with DOJ EDNY regarding potential civil rights enforcement action and setting up meeting w/ AS	3.10	JLN
September 22, 2010	Meeting with JF to prepare for EDNY DOJ	1.10	JLN
September 23, 2010	Meeting with GC, JF and Center for Constitutional Rights (CCR) re Schoolcraft	2.25	JLN
September 23, 2010	Discussion with JF re new post for THEE Ranrt for more whistleblower Pos to support <u>Monell</u> claim	0.30	JLN
September 23, 2010	Reviewed insurance coverage for Def. Isakov	0.10	JLN
September 24, 2010	Discussion with JF and GC re: first meeting with the DOJ and upcoming meeting with the DOJ and AS	1.75	JLN
September 25, 2010	Meeting with GC & JF re: upcoming AS interview with feds	0.50	JLN
September 25, 2010	E-mail from JF re: upcoming fed meeting with AS	0.10	JLN
September 27, 2010	Meeting with AS and Feds re: potential fed civil rights violations	2.30	JLN
September 27, 2010	Discussion with JF re: location of witnesses from This American Life interview	0.50	JLN
September 28, 2010	Continued review of transcript of PBA (Velez) hearing re: quotas	1.70	JLN
September 28, 2010	E-mail from JF re article in Russian news	0.10	JLN
September 29, 2010	Finished review of PBA transcript	2.80	JLN
September 30, 2010	Meeting with GC and JF re: anonymous cop interviews (VM and EF)	1.10	JLN
September 30, 2010	Reviewed answer to complaint filed by Lillian Aldana-Bernier	0.50	JLN
September 30, 2010	Reviewed Bernier's corporate disclosure statement	0.10	JLN
October 2, 2010	E-mail exchanges w/ GC re: whistleblower cops	0.30	JLN
October 2, 2010	E-mail from JF re whistleblower cop	0.10	JLN
October 2, 2010	E-mail re whistleblower cop from JF	0.10	JLN



October 4, 2010	Meeting w/ GC and JF to discuss information from "JR" retired police officer re: quotas, downgrading, NYPD corruption	0.75	JLN
October 6, 2010	Reviewed answer to amended complaint filed by Jamaica Hospital	0.10	JLN
October 7, 2010	T/c w/ Colleen Long (AP wire) re: doing story on Schoolcraft	0.60	JLN
October 8, 2010	Review of AP story re: Schoolcraft case	0.20	JLN
October 10, 2010	Meeting with GC and JF re: information provided by MV, NB, EB whistleblower cops	1.40	JLN
October 11, 2010	E-mail from JF re Lewis whistleblower cop	0.90	JLN
October 11, 2010	E-mail correspondence w/ GC re: Posts	0.20	JLN
October 11, 2010	E-mail exchange with Chris Whitehead re: Compstat videos and possibly obtaining copies of same	0.10	JLN
October 12, 2010	Reviewed memo of law in Support of defendants JHMC motion to Dismiss; ; took notes re: same; researched case law cited	2.80	JLN
October 12, 2010	Meeting w/GC re: Schoolcraftjustice.com calls from POs	1.00	JLN
October 12, 2010	Discussion with JF re motion to Dismiss sched.	0.30	JLN
October 12, 2010	Reviewed Declaration of Gregory J. Radomisli in Support of defendant JHMC motion to Dismiss	0.30	JLN
October 13, 2010	Discussion with JF re: arguments to make in response to JHMC motion	1.25	JLN
October 13, 2010	Discussion with JF re agreement on briefing sched. w/ defendant Jamaica Hosp.	0.10	JLN
October 14, 2010	Meeting with GC re: information provided by PL and RL (whistleblower cops) to support <u>Monell</u> claim	0.75	JLN
October 15, 2010	Reviewed order re: defendant JHMC's motion to Dismiss	0.10	JLN
October 30, 2010	Meeting with GC & JF re: information provided by MR, MG RC (whistleblower cops) and movie and book publicist contacting AS for information	2.25	JLN
November 1, 2010	Meeting with GC and JF re: updating Schoolcraft website	0.30	JLN
November 1, 2010	Reviewed letter addressed to Judge Sweet from DC requesting ext. of time to answer	0.10	JLN
November 8, 2010	Read 1st Set of Rgs for plaintiff sent by Isakov	0.10	JLN
November 8, 2010	Reviewed defendant Isakov's dep notice for plaintiff Adrian Schoolcraft	0.10	JLN
November 8, 2010	Reviewed Defendant Isakov's request for Production of Documents	0.10	JLN
November 9, 2010	Meeting with GC about interviews with CW and MC whistleblower cops regarding Monell claim	0.60	JLN



November 9, 2010	Drafted letter to Judge Sweet requesting extension JHMC's motion to dismiss	0.30	JLN
November 9, 2010	Reviewed Dep notice for plaintiff from B. Lee	0.10	JLN
November 11, 2010	Reviewed defendant Bernier's 1st Set of Interrogatories	0.10	JLN
November 11, 2010	Reviewed defendant Bernier's answer to Second amended complaint	0.10	JLN
November 11, 2010	Reviewed defendant Isakov's corporate disclosure statement	0.10	JLN
November 12, 2010	Meeting with JF and GC re: issues on our opposition and GC's meeting with JW anonymous cop	0.30	JLN
November 14, 2010	Reviewed AS recordings w/ Kings County DA and Queens County Michelle Cort	0.40	JLN
November 15, 2010	Review AS application to NYPD	0.30	JLN
November 16, 2010	Review of affidavit Darius Charney wants Schoolcraft to sign Aff for <u>Floyd</u>	0.40	JLN
November 16, 2010	E-mailed GC re: changes to Schoolcraft <u>Floyd</u> affidavit	0.10	JLN
November 16, 2010	Reviewed memo from Lt. Brower (April 10, 2006) re: forced O.T.	0.10	JLN
November 29, 2010	Reviewed draft CCR Affidavit by AS	0.10	JLN
December 1, 2010	Discussion with GC & JF re affidavit from Schoolcraft	0.40	JLN
December 2, 2010	Reviewed AS proposed changes to Affidavit	0.20	JLN
December 2, 2010	Reviewed Defendant City of New York's answer to amended complaint	0.10	JLN
December 4, 2010	E-mail exchange w/ AS re: Detective accused of falsifying records and making bogus arrests	0.10	JLN
December 5, 2010	Reviewed JF's draft Opp to MTD; made edits to same	0.70	JLN
December 6, 2010	Discussion with GC & JF re final corrections	0.80	JLN
December 8, 2010	Reviewed NYPD memos regarding anti quota legislation	1.20	JLN
December 9, 2010	Discussion w/ JF & GC re discovery responses & timing	0.50	JLN
December 10, 2010	E-mail w/ GC re: HIPAAs for AS meds	0.10	JLN
December 11, 2010	E-mail exchange re: posting on Thee Rant relating to Mauriello	0.10	JLN
December 14, 2010	Reviewed Darius Charney correspondence re affidavit for AS	0.20	JLN
December 16, 2010	Reviewed final AS Affidavit for CCR	0.10	JLN
December 17, 2010	E-mail from JF re AS benefits	0.10	JLN
January 1, 2011	E-mail to JF re WSJ article about case	0.10	JLN
January 10, 2011	Meeting with GC & JF re interrogatories and demands & misc. discovery & strategy issues	1.50	JLN

January 20, 2011	Meeting with GC, JF to discuss JHMC's reply memo of law	0.40	JLN
January 20, 2011	Reviewed Defendant JHMC's reply memo of law in Support of their motion to Dismiss; additional research regarding issues raised in same	0.30	JLN
January 26, 2011	Discussion with GC & JF re oral arguments on MTP	0.60	JLN
January 31, 2011	Discussion w/ GC re: requesting Queens DA to investigate Halloween night	0.40	JLN
January 31, 2011	Meeting with JF & GC re sending documents & authorizations to Queens DA office	0.40	JLN
January 31, 2011	Review of materials sent to Queens DA to start investigation	0.20	JLN
February 8, 2011	Discussion w/ JF & GC re letter to court to schedule discovery	0.30	JLN
February 11, 2011	Researched issue of stay while MTD is pending	2.40	JLN
February 11, 2011	Reviewed JHMC request for stay while MTD is pending	0.10	JLN
February 12, 2011	Discussion with JF re; motion to stay and arguments in opposition	0.90	JLN
February 13, 2011	Drafted letter brief opposing stay	3.20	JLN
February 19, 2011	E-mail exchange the trial in Kings County involving quota allegations and testimony from Captain Perez (81)	0.20	JLN
February 19, 2011	E-mail correspondence w/ GC re: Seth Harris verdict finding quota in Carolyn Samuels case	0.10	JLN
February 23, 2011	E-mail exchange with Chris Whitehead re Anti-Quota Bill and his failure to get promoted based on numbers	0.10	JLN
February 25, 2011	E-mail exchange with C. Whitehead re: Marino, Carolyn Samuels case and Capt. Alex Perez's testimony in that case	0.10	JLN
March 1, 2011	Meeting with anonymous cops from T34 w/ GC and JF - recordings of Lt. Janice Williams	1.25	JLN
March 1, 2011	Reviewed recordings of Sgt. Hans, and Lt. Williams provided by PO "Angel" Rosa	0.30	JLN
March 3, 2011	E-mail exchange with C. Whitehead re: Daily News article on quotas and pressure.	0.10	JLN
April 12, 2011	Conv w/ JF re AS suspension & our position with NYPD on same	0.30	JLN
April 13, 2011	E-mail exchange with C. Whitehead re: Marino steroids findings & punishment	0.10	JLN
April 13, 2011	E-mail exchange with C.Whitehead re: LAPD Officers Quota lawsuit and possible implications for quota claims in this case	0.10	JLN

April 18, 2011	Discussion w/ JF & GC re prep of letter re NYPD hearing & PBA representation	0.30	JLN
May 6, 2011	Read Judge Sweet's decision on defendants' MTD; notes re: same	0.30	JLN
May 6, 2011	E-mail exchange w/ GC and JF re: motion to dismiss decision	0.20	JLN
May 9, 2011	Drafted 1st Set of Rogs to Isakov	2.10	JLN
May 9, 2011	Meeting with GC and JF re: necessary disclosures under Rule 26 for plaintiff	1.75	JLN
May 9, 2011	Started drafting R.26 Initial Disclosures	0.40	JLN
May 10, 2011	Started drafting Requests For Admission ("RFA") from City	2.50	JLN
May 10, 2011	Finished Initial Disclosures.	1.40	JLN
May 10, 2011	Meeting with GC and JF re: edits to Initial disclosures and discussion regarding requests to admit	1.40	JLN
May 12, 2011	Discussion w/ GC & JF re agency agreement	0.40	JLN
May 14, 2011	Continued drafting RFA for City	2.20	JLN
May 15, 2011	Finished drafting RFA for City	2.40	JLN
May 15, 2011	Meeting with GC and JF re: edits to RFA's	1.00	JLN
May 16, 2011	Started drafting Rogs for City	1.90	JLN
May 17, 2011	Cont'd drafting Rogs for City	2.40	JLN
May 18, 2011	Started drafting 1st Doc Demands City	1.60	JLN
May 19, 2011	Continued drafting document demands for City	2.10	JLN
May 19, 2011	Discuss w/ JF & GC edits & topic areas that should be explored on interrogatories	1.25	JLN
May 19, 2011	Drafted Schoolcraft deposition notices.	0.40	JLN
May 19, 2011	Review of GC's draft document demands to include in our demands	0.30	JLN
May 19, 2011	E-mail from GC re: additional dep notices to be served	0.10	JLN
May 19, 2011	Sent draft document demands to GC	0.10	JLN
May 20, 2011	Finished drafting Rogs for City	2.80	JLN
May 20, 2011	Finished drafting 1st Document Demands for City	2.70	JLN
May 20, 2011	Discussion w/ GC & JF re request to admit corrections/additions	1.50	JLN
May 20, 2011	T/c AS & LS re: discovery demands/admissions & adding many more demands that they feel are important (vs. overbroad/irrelevant concerns)	1.40	JLN
May 20, 2011	Finalize interrogatories & discuss EBTs w/ JF & GC	1.30	JLN
May 20, 2011	E-mail exchange AS re: 1st Set of Interrogatories	0.20	JLN
May 20, 2011	E-mail exchange re: Plaintiff's First Request for Admissions	0.20	JLN
May 20, 2011	Sent GC request for admissions for review	0.10	JLN

May 20, 2011	Sent GC revised draft document demands for review	0.10	JLN
May 21, 2011	Started drafting 1st Set of Document Demands for JHMC	2.30	JLN
May 22, 2011	Finished 1st Set of Doc Demands Jamaica	2.90	JLN
May 22, 2011	Started drafting Schoolcraft document demands for other defendants	1.70	JLN
May 23, 2011	Continued drafting Schoolcraft discovery demands and interrogatories against medical defendants	3.60	JLN
May 23, 2011	Drafted 1st Set of Rogs for JHMC	2.30	JLN
May 23, 2011	E-mail correspondence w/Brian Lee re: dep notices for Caughey & Weiss	0.10	JLN
May 23, 2011	Reviewed Notice of Deps for Isakov/Bernier	0.10	JLN
May 24, 2011	Finished drafting discovery demands/rogs for med defendants	3.70	JLN
May 24, 2011	Review of E-mail and correspondence w/ GC re anonymous P.O. from 81st precinct	0.30	JLN
May 25, 2011	Drafted Notice of Inspection for JHMC	2.30	JLN
June 1, 2011	Reviewed initial disclosure from JHMC	0.10	JLN
June 3, 2011	Reviewed JHMC's Initial Disclosures	0.10	JLN
June 10, 2011	T/c w/Donna Canfield re: extending City defendants' time to answer from June 20 to July 20; e-mail f/u regarding same.	0.10	JLN
June 11, 2011	Ltr from B. Lee re: discovery responses and order of priority	0.10	JLN
June 13, 2011	E-mail exchange w/Jim Leander (Queens DA Office) re: setting up a meeting to discuss Schoolcraft investigation	0.10	JLN
June 16, 2011	E-mail exchange upcoming meeting with Queens DA & plaintiff desire to postpone meeting until we have discovery responses	0.20	JLN
June 16, 2011	E-mail exchange w/ team re: another NYPD Detective caught giving false testimony	0.10	JLN
June 17, 2011	Reviewed Isakov response to Document Demands	0.10	JLN
June 17, 2011	Reviewed Isakov response to Rogs	0.10	JLN
June 21, 2011	E-mail exchange re: 3 cases in EDNY with Mauriello as one of defendants	0.10	JLN
June 21, 2011	E-mail exchange re: Queens DA meeting & avoiding any contact w/ press/media	0.10	JLN
June 23, 2011	Review of answers to interrogatories by Isakov	0.90	JLN
June 23, 2011	Review of response to doc demands by Isakov; notes re: same	0.70	JLN
June 23, 2011	Discussion with GC & JF re responses & requests from Isakov	0.60	JLN
June 23, 2011	Review of requests for discovery from Isakov	0.30	JLN

June 23, 2011	Letter to Jim Leander re: authorizing release of med records to Queens DA	0.10	JLN
June 24, 2011	Reviewed Def. Isakov's 2nd Request for Docs	0.10	JLN
June 27, 2011	Discussion with JF and GC re City's failure to respond to discovery requests	0.30	JLN
June 27, 2011	E-mail exchanges with all counsel re: setting up R. 26 Conf. for scheduling of discovery	0.20	JLN
June 30, 2011	Rule 26 Conf. w/all counsel present	0.90	JLN
June 30, 2011	Reviewed Brian Lee's Proposed Discovery Plan in advance of mtg later today; notes re: same	0.20	JLN
July 1, 2011	E-mail from B.Brady re: need to modify plan re: setting deps only after receipt of records from City	0.10	JLN
July 1, 2011	Reviewed Brian Lee's Proposed Discovery Plan as agreed upon at yesterday's conference.	0.10	JLN
July 5, 2011	Review discovery plan w/ JF & GC	0.30	JLN
July 6, 2011	Mtg. w/ Jim Leander & AS re: Schoolcraft investigation	2.40	JLN
July 6, 2011	Discussion w/ JF & GC re changing case management plan	0.40	JLN
July 8, 2011	Discussion with GC and JF re: meeting with Jim Leander and AS about investigation	1.75	JLN
July 8, 2011	Reviewed Judge Sweet's order re: Oct. 5 conf	0.10	JLN
July 9, 2011	E-mail from City on relevancy redaction issue	0.10	JLN
July 9, 2011	E-mail to City re: redaction issue	0.10	JLN
July 11, 2011	Final review of discovery plan w/ JF & GC	0.25	JLN
July 15, 2011	Meeting with JF an GC re: discovery plan and issues to raise with defense counsel	0.50	JLN
July 15, 2011	sent GC E-mail re: objections to discovery plan	0.10	JLN
July 18, 2011	Review of changes to discovery plan made by B. Lee	0.20	JLN
July 18, 2011	Sent draft E-mail to DC re changes for review	0.10	JLN
July 23, 2011	E-mail w/Greg Radomisil re: extending time for inspection of JHMC	0.10	JLN
August 5, 2011	Reviewed JHMC guidelines re: Involuntary commitment, Psych ER guidelines and use of handcuffs	0.90	JLN
August 10, 2011	Review of GC comments to JHMC discovery responses	0.20	JLN
August 11, 2011	Review of responses to Isakov discovery demands	0.40	JLN
August 14, 2011	Review GC's draft responses to all discovery demands for medical defendants	0.40	JLN
August 15, 2011	Review of our responses to Bernier & Jamaica discovery demands; edits/revisions	0.80	JLN
August 15, 2011	Reviewed Rule 26 (a) Discovery plan filed by Isakov	0.10	JLN
August 16, 2011	Reviewed confidentiality stip from City	0.30	JLN

August 17, 2011	Discuss confidentiality stip w/ GC & JF b/c of plaintiff's objections	1.25	JLN
August 26, 2011	Read letter from B. Lee re: request for Suppl responses	0.40	JLN
September 1, 2011	Review of E-mail from Darius Charney enclosing <u>Floyd</u> decision; read SJ decision; took notes re: same	0.50	JLN
September 12, 2011	Drafted letter motion to compel City defendants to produce discovery	0.70	JLN
September 20, 2011	Reviewed Judge Sweet's order re: motion to compel and setting oral argument date	0.10	JLN
September 26, 2011	T/c w JHMC def. counsel re: extending time for hospital to respond and/or object to visiting JHMC and/or taking pics.	0.30	JLN
September 28, 2011	Discussion w/ JF re law enforcement privilege & motion to compel	1.25	JLN
September 28, 2011	Attend oral argument on motion to compel	1.00	JLN
September 28, 2011	Prepare for hearing before Judge Sweet regarding Plaintiff's letter motion to Compel	0.70	JLN
September 28, 2011	Travel to SDNY - motion to compel (.5)	0.25	JLN
September 28, 2011	E-mail from JF re law enforcement privilege	0.10	JLN
September 30, 2011	E-mail from all parties re: executed amended discovery plan	0.20	JLN
October 5, 2011	Reviewed Rule 26 Discovery Plan filed by B. Lee	0.10	JLN
October 7, 2011	Started Review of first set of docs exchanged by City, including Interim IAB Report, QAD Report, Personell folders, memobook entries etc.; took notes re: same	4.25	JLN
October 8, 2011	Cont'd review of City's 1st response to doc. Demands. Took notes re same	4.70	JLN
October 8, 2011	Review of operations order sent from client	0.40	JLN
October 17, 2011	order from Judge Sweet directing parties to appear for PTC	0.10	JLN
November 1, 2011	Reviewed Isakov 3rd request for docs	0.10	JLN
November 17, 2011	E-mail from D. Charney re: Polanco Recordings for use in Schoolcraft action; GC to pick up recordings later today.	0.10	JLN
November 18, 2011	Listened to Polanco recordings, including Heran, McHugh, Sgt. Bennett; took notes re: same.	1.40	JLN
November 18, 2011	Reviewed misc recordings re: "4 collars" Jones, Guillermo and Kamper	0.40	JLN
November 29, 2011	E-mail from B. Lee re: upcoming discovery conference and status of case	0.10	JLN
December 5, 2011	Started review disclosures from D. Canfield, including BNIU file and multiple CD Recordings	1.80	JLN



December 5, 2011	Reviewed City's first set of doc demands, City's response to Plaintiff's request for admissions, & City's Rule 26 disclosures	0.60	JLN
December 6, 2011	Con'td review of BNIU file and recordings; took notes re same	3.75	JLN
December 13, 2011	Drafted letter re: supplemental discovery responses for med. Defendants	0.10	JLN
December 19, 2011	Discussion w/ GC & JF re plaintiff's thoughts on discovery & next steps for moving forward	0.50	JLN
December 23, 2011	Reviewed recordings and documents from Frank Palestro	2.40	JLN
January 5, 2012	Reviewed ltr from def. counsel re: request for IRS releases	0.10	JLN
January 10, 2012	Meeting with AS, JF and GC re: multiples issues in use & general strategy for moving forward	4.90	JLN
January 20, 2012	Phone call with Adrian and Larry	0.70	JLN
January 24, 2012	Spoke to GC re: AS salary	0.20	JLN
February 7, 2012	Email from GC re: supplemental demands	0.10	JLN
February 7, 2012	Review Notice of Appearance for City Defendants	0.10	JLN
February 7, 2012	Reviewed Notice of Apperance by Max Leighton on behalf of City	0.10	JLN
February 8, 2012	Pre-trial conference before Judge Sweet	1.00	JLN
February 8, 2012	Discussion with JF and GC re: conference and discovery and strategy for moving forward	0.75	JLN
February 9, 2012	Started drafting Second Set of Document Demands for City	2.60	JLN
February 9, 2012	Reviewed Judge Sweet's order setting motion schedule and discovery deadlines	0.10	JLN
February 10, 2012	Started drafting 2nd Request for Docs from City	3.40	JLN
February 10, 2012	Revised, edited and finalized Second Set of Document Demands for City. Also drafted list of items needed for subpoenas and for supplemental disclosure from City.	2.20	JLN
February 10, 2012	Discussion w/ JF & GC re additional items of discovery	1.60	JLN
February 10, 2012	T/c with Adrian and Larry regarding update on correspondence and update on new discovery demands	0.70	JLN
February 10, 2012	Reviewed proposed supplemental demands for the City	0.40	JLN
February 10, 2012	Telephone Conversation with GC regarding discovery demands and additional demands	0.30	JLN
February 10, 2012	E-mail to GC re discovery we need to follow up with city	0.20	JLN
February 10, 2012	E-mail to JF re additional items of discovery from City & subpoenas for Johnstown records	0.20	JLN



February 10, 2012	E-mail to GC re: Cancellation of Adrian and Larry trip to NYC	0.10	JLN
February 10, 2012	Review of E-mail to Jeremy Steven (investigator) re: subpoena of Schoolcraft records	0.10	JLN
February 13, 2012	Review of final supplemental discovery demands for NYC	0.30	JLN
February 24, 2012	Review of E-mail correspondence w/Chris Dunn (NYCLU)	0.20	JLN
February 26, 2012	Reviewed Fulton County Records re: AS Produced pursuant to subpoena; took notes re: same.	2.40	JLN
February 26, 2012	Reviewed records from Fulton County Volume - I	0.70	JLN
February 27, 2012	Review of subpoena response from Johnstown PD	1.00	JLN
February 27, 2012	Reviewed records from Fulton County Volume - II	0.90	JLN
February 27, 2012	Meeting with JF and GC re: documents received from Johnstown PD for plaintiff's subpoena	0.75	JLN
February 28, 2012	E-mail exchange re: number of actual visits by Johnstown PD & dates times (vs. their dates/times)	0.20	JLN
March 6, 2012	Reviewed article re: Eterno/Silverman analyze flaws in NYPD terror effort	0.10	JLN
March 7, 2012	Discussed adding 1st Amendment claim with JF and GC	0.25	JLN
March 7, 2012	Reviewed Notice of Appearance by Suzanna Publicker on behalf of City	0.10	JLN
March 8, 2012	Discussion with JF & GC re Voice article and the confidential report	0.75	JLN
March 9, 2012	Began drafting responses to City's Documents Demands	1.70	JLN
March 9, 2012	Discussion with JF & GC re reinstating 1st Amendment claims in this case based on Garcetti & actions after the fact	1.25	JLN
March 9, 2012	Drafted letter to Lt. Gilbo Johnstown PD re: missing documents on visits to Schoolcraft	0.90	JLN
March 12, 2012	Continued drafting responses to City Documents Demands	2.80	JLN
March 12, 2012	Meeting with JF & GC re letter from City	0.60	JLN
March 12, 2012	Revised & edited response to City's letter re protective order	0.25	JLN
March 12, 2012	Read/review of letter from defendant City on breach of confidentiality stip	0.20	JLN
March 12, 2012	E-mail to JF re corrections to motion to reinstate	0.10	JLN
March 14, 2012	E-mail from JF with proposed amended complaint	0.10	JLN
March 14, 2012	Review of NY Times article on Schoolcraft	0.10	JLN

March 15, 2012	Meeting with JF and GC re proposed amended complaint	0.60	JLN
March 19, 2012	Discussions w/ JF re amended complaint	0.50	JLN
March 21, 2012	Read ltr motion from NYT seeking disclosure of Schoolcraft Materials.	0.20	JLN
March 22, 2012	Final edits on amended complaint w/ JF	0.25	JLN
March 25, 2012	Finished responses to City's document demands; forward same to GC & JF for review	2.40	JLN
March 26, 2012	City's response to NYT Ltr motion	0.20	JLN
March 26, 2012	E-mail exchange re Whistblowing Sgt. had role in crime spike in Queens Pct.	0.10	JLN
March 26, 2012	Reviewed order of Judge Sweet re: NYT motion	0.10	JLN
March 28, 2012	Oral Argument on City motion	1.00	JLN
March 28, 2012	Discussion with JF and GC re: court's order on City's motion for breach of confidentiality agreement	0.50	JLN
March 28, 2012	Meeting w/ JF & GC prior to upcoming conference to prep	0.40	JLN
March 28, 2012	Ltr from S. Publicker re: plaintiff's outstanding discovery	0.10	JLN
March 29, 2012	Revised and help draft proposed AEO stip w/GC and JF for City	0.80	JLN
March 29, 2012	Review of AEO; Notes regarding same	0.60	JLN
March 30, 2012	Discussion with GC and JF re: filing motion to amend and discovery issues	0.60	JLN
March 30, 2012	Meeting w/ JF & GC re AEO changes	0.60	JLN
March 30, 2012	Final review of proposed AEO stip	0.30	JLN
March 30, 2012	E-mail from Eli Silverman re: ABC news story on under reoprted crime rates; watched same	0.20	JLN
March 30, 2012	E-mail from City re: IAB docs and extending time to produce	0.10	JLN
March 30, 2012	E-mailed proposed AEO stip to the City	0.10	JLN
April 2, 2012	E-mail from Bernier consenting to amendment	0.10	JLN
April 2, 2012	E-mail from Isakov consenting to amendment	0.10	JLN
April 4, 2012	E-mail from JHMC regarding change in amended language	0.10	JLN
April 5, 2012	Drafted response to Defendants 1st Set of Document Demands	2.80	JLN
April 5, 2012	Review & discuss w/ JF & GC plaintiff's responses to City demands	0.80	JLN
April 5, 2012	E-mail from City stating reasons why they oppose amendment to complaint	0.10	JLN
April 8, 2012	T/c w/Kevin Rodriguez (PBA Delegate & PO in 52) re quotas in his precinct; sending materials for our review	0.70	JLN

April 9, 2012	E-mail correspondence w/GC re: discovery responses	0.10	JLN
April 10, 2012	Meeting w/ AS re: case status general strategy next steps for moving forward	4.60	JLN
April 10, 2012	E-mail re: Schoolcraft arrival to NYC	0.10	JLN
April 13, 2012	Discussion with GC and JF re: Matthews decision	0.60	JLN
April 13, 2012	Read <u>Matthews</u> decision; took notes re: same	0.50	JLN
April 13, 2012	E-mail from plaintiff re 1st Amendment claim	0.10	JLN
April 23, 2012	Reviewed draft letter from JF regarding motion to amend complaint; made edits to same	0.40	JLN
April 25, 2012	Discussion with re: edits/changes to 1st Amendment letter	0.75	JLN
April 25, 2012	Reviewed JF letter to Court requesting leave to amend to add Lt. Hanlon	0.10	JLN
April 30, 2012	Discussion w/ JF re NY Times alteration to protective order	0.30	JLN
April 30, 2012	E-mail from JF to City re additions to protective order	0.10	JLN
May 1, 2012	Discussions w/ JF re City's request for affidavits & deposition for confidentiality breach	0.40	JLN
May 2, 2012	E-mail to JF to City re confidentiality and discovery issues	0.10	JLN
May 3, 2012	Discussion w/ GC & JF re Affidavits and Conf. Stip AEO	0.75	JLN
May 8, 2012	Discussion w/ JF and GC re argument on 1 <sup>st</sup> Amendment claim	0.60	JLN
May 8, 2012	Reviewed Notice of Appearance by William Fraenkel on behalf of City	0.10	JLN
May 9, 2012	Attended Argument on 1st Amendment claim	1.00	JLN
May 11, 2012	Read defendant's motion to quash and discussion w/ GC & JF re: same	2.10	JLN
May 12, 2012	Reviewed letter by S. Publicker regarding quashing Vallone subpoena	0.10	JLN
May 13, 2012	Reviewed docs from another quota case (Robinson v. City, 05cv9545) Reviewed dep transcripts from Robinson, Including Emmanuel Bowser, Michael Ryan J. Robinson); took notes re: same	3.40	JLN
May 16, 2012	Legal research regarding City motion to Quash	3.40	JLN
May 16, 2012	Began drafting letter opposing City motion	1.60	JLN
May 16, 2012	Discussion w/ JF and GC re opp to defendant's motion to quash	0.60	JLN
May 17, 2012	Finished drafting Opposition to motion to Quash	3.20	JLN
May 17, 2012	Discussion w/GC and JF re: AS breach affidavit	0.70	JLN
May 17, 2012	Review and discuss City New York Times opp letter w/ JF & GC	0.40	JLN

May 22, 2012	Discussion w/ JF & GC re defendant's letter re Vallone subpoena	0.60	JLN
May 23, 2012	Prep for argument w/ JF & GC	1.00	JLN
May 24, 2012	Notice of Appearance by Walter Kretz, behalf of Mauriello; Google search re: Kretz	0.20	JLN
May 24, 2012	E-mail from S. Publicker re: proposed changes to Confidentiality Stip	0.10	JLN
May 30, 2012	E-mail exchange w/GC and JF re City stips and revisions	0.30	JLN
June 2, 2012	Reviewed discovery demands from JHMC	0.20	JLN
June 5, 2012	Review of E-mail correspondence between SP and Times	0.10	JLN
June 6, 2012	Reviewed Confidentiality stip and proposed changes made by GC; made additional edits/suggestions	0.30	JLN
June 6, 2012	Review of E-mail correspondence between SP and Times	0.10	JLN
June 7, 2012	Reviewed final AEO Stip	0.30	JLN
June 7, 2012	E-mail exchange w/GC re: changes to AEO stip	0.10	JLN
June 8, 2012	E-mail from GC to SP re: redlined changes to proposed Stip.	0.10	JLN
June 8, 2012	Read ltr from NYT counsel re: inventory of confidential materials for	0.10	JLN
June 14, 2012	Meet with GC and JF to discuss motion for reconsideration on 1st amendment claim	0.75	JLN
June 14, 2012	Reviewed background search by Warren Investigators of Marino, Lauterborn and Mauriello	0.30	JLN
June 14, 2012	Read Judge Sweet's Opinion on Plaintiff's motion to amend Councilman Vallone's motion to quash	0.20	JLN
June 18, 2012	Reviewed JF draft motion for reconsideration; made edits to same	0.40	JLN
June 19, 2012	Meeting with Schoolcraft in Johnstown	4.80	JLN
June 19, 2012	Travel back to NYC from Johnstown (3.5)	1.75	JLN
June 19, 2012	Travel to Johnstown (3.5)	1.75	JLN
June 21, 2012	E-mail correspondence w/GC and JF re Schoolcraft issues	0.20	JLN
June 26, 2012	Read Judge Sweet's order re: motion to reconsider	0.10	JLN
July 5, 2012	Reviewed Frankel letter opposing plaintiff motion for reconsideration of 1st Amend Claim	0.10	JLN
July 12, 2012	Review of Schoolcraft's recordings; prepared comprehensive timeline; sent to JF	3.80	JLN
July 13, 2012	E-mail from City regarding tax return authorizations	0.10	JLN
July 17, 2012	E-mail w/GC re: upcoming meeting in Albany with Schoolcrafts	0.10	JLN

July 20, 2012	Read Opinion of Judge Sweet denying Plaintiff's motion to reconsider	0.10	JLN
July 23, 2012	Discussion w/ GC & JF re: upcoming meeting w/ Schoolcrafts in Albany	0.30	JLN
July 23, 2012	E-mail exchange w/JF & GC re: visit to Schoolcrafts in Albany	0.10	JLN
July 24, 2012	E-mail from JF re Albany meeting w/ Schoolcrafts	0.10	JLN
July 28, 2012	Discussion w/ JF & GC re motion to amend to add prior restraint	0.60	JLN
July 31, 2012	Reviewed JF draft of letter seeking leave to amend; edits to same	0.20	JLN
August 3, 2012	E-mail from S. Publicker re: format of document production once stip is finalized	0.10	JLN
August 7, 2012	Read order re: plaintiff's motion to amend	0.10	JLN
August 8, 2012	Meeting w/ JF & GC re: upcoming meeting w/ AS in Albany for prep	1.30	JLN
August 8, 2012	Review of final stips	0.50	JLN
August 8, 2012	Printed out docs to go over with Adrian	0.20	JLN
August 9, 2012	Meeting w/AS in Albany	5.75	JLN
August 9, 2012	Meeting with Client in Albany with GC & JF	5.50	JLN
August 9, 2012	Traveled from Albany back to NYC (3.0)	1.50	JLN
August 9, 2012	Traveled to Albany to meet Client (3.0)	1.50	JLN
August 10, 2012	E-mail correspondence re: extension of discovery	0.20	JLN
August 10, 2012	E-mail from JF re extension of discovery	0.10	JLN
August 10, 2012	E-mail to JF re extension of discovery	0.10	JLN
August 10, 2012	E-mail to JF re plaintiff's dep	0.10	JLN
August 10, 2012	E-mail w/GC re Schoolcraft breach affidavit	0.10	JLN
August 10, 2012	Response E-mail regarding deposition from Greg R.	0.10	JLN
August 13, 2012	Reviewed City's supplemental disclosure of docs (non-confidential records from IAB file); took notes re: same	3.40	JLN
August 13, 2012	Continued review of discovery produced by NYC	2.80	JLN
August 13, 2012	E-mail from Brian Lee regarding deposition	0.10	JLN
August 13, 2012	Review of E-mail from SP re: scheduling AS depo	0.10	JLN
August 14, 2012	Continued review of doc production by city; highlighted & took notes re: same	3.60	JLN
August 14, 2012	Drafted letter to defense counsel re: Schoolcraft tax returns	0.10	JLN
August 14, 2012	E-mail from Brady re deps	0.10	JLN
August 14, 2012	E-mail from JF re letter to City w/ tax authorizations	0.10	JLN
August 14, 2012	E-mail from JF re plaintiff's dep	0.10	JLN
August 14, 2012	E-mail to JF re plaintiff's dep	0.10	JLN
August 14, 2012	Review of correspondence re Tax returns	0.10	JLN

August 15, 2012	Continued review of doc production by city; took notes re: most imp. Docs.	4.20	JLN
August 15, 2012	E-mail from B Brady re plaintiff's dep	0.10	JLN
August 15, 2012	E-mail from B. Lee re plaintiff's dep	0.10	JLN
August 15, 2012	E-mail from Brian Lee re subpoenaed docs	0.10	JLN
August 16, 2012	Discussion w/ JF & GC re City's suggestion on multiple depositions of AS & best way to oppose same.	0.70	JLN
August 16, 2012	E-mail from City re plaintiff's dep	0.10	JLN
August 16, 2012	E-mail to JF re plaintiff's dep	0.10	JLN
August 20, 2012	Discussion w/ JF & GC re amendment of the complaint to add Lt. Hanlon	0.60	JLN
August 20, 2012	Discussion w/ JF re AS dep prep	0.40	JLN
August 20, 2012	Reviewed City's Second Request for Docs.	0.20	JLN
August 20, 2012	Review of E-mail from JF to City re amendment adding Lt. Hanlon	0.10	JLN
August 21, 2012	E-mail from Brady consenting to Amendment	0.10	JLN
August 21, 2012	E-mail from Brady re scheduling AS dep	0.10	JLN
August 21, 2012	E-mail from City requesting copy of complaint	0.10	JLN
August 22, 2012	Meeting w/ GC & JF re Kretz's request to have an additional day to depose plaintiff	0.40	JLN
August 22, 2012	E-mail from City re AS dep date	0.10	JLN
August 22, 2012	E-mail from GC re dep dates	0.10	JLN
August 23, 2012	Reviewed correspondence between Al Vann and Ray Kelly	0.10	JLN
August 27, 2012	Reviewed Supplemental Disclosures from City	0.10	JLN
August 28, 2012	Drafted letter to Court re: extension of discovery deadline	0.40	JLN
August 28, 2012	E-mail from GC re Chief article	0.10	JLN
August 28, 2012	E-mail from JF to defendants enclosing responses to discovery	0.10	JLN
August 29, 2012	Mtg. w/ JF & GC re: City's Suppl. Disclosure & the need for us to depose at least 5 of the 9 new witnesses identified by City & other gen. strategy issues for advancing discovery	0.80	JLN
August 29, 2012	Reviewed City's Suppl. R. 26 disclosures re: P.O. Rodriguez, P.O. Rudy (both at 81 when Pl. left) & P.O. Sadowski & EMT Villaverde & Det Yeager, etc	0.10	JLN
September 1, 2012	Multiple e-mails and attachments from PO Kevin Rodriguez re: quota activity at the 52 pct.	0.30	JLN
September 6, 2012	Reviewed grievance filed by Kevin Rodriguez	0.20	JLN
September 7, 2012	E-mail exchange w/ K. Rodriguez re: monthly performance evaluations & evidence of quotas/pressure	0.20	JLN
September 10, 2012	Read Opinion & order from Judge Sweet on plaintiff's motion to amend	0.70	JLN



September 10, 2012	E-mail from GC re 120 day extension of discovery deadline	0.10	JLN
September 10, 2012	E-mail from JF re 120 extension of discovery deadline	0.10	JLN
September 10, 2012	E-mail to JF re 120 extension of discovery deadline	0.10	JLN
September 10, 2012	Response from City on Hanlon amend; noes re: same	0.10	JLN
September 11, 2012	Drafted letter seeking extension of discovery deadline until January 2013	0.40	JLN
September 12, 2012	Reviewed ltr and enclosures from ACC Publicker, including multiple CD's with recorded interviews made by IAB (non-confidential); began listening to CD interviews (3742-3748)	3.40	JLN
September 13, 2012	Cont'd listening to CD interviews from IAB (non-confidential) investigation	3.70	JLN
September 14, 2012	Cont'd listening to CD interviews from IAB (non-confidential) investigation	4.60	JLN
September 14, 2012	Reviewed materials sent by Kevin Rodriguez, including Sgt Summa statements re: "activity", various recordings; performace evaluations; numerous memoranda, posts and photos	3.70	JLN
September 14, 2012	Reviewed prodction by City	0.40	JLN
September 15, 2012	Listened to recordsings of Capt. Thoms J. Kemper at Transit District 4; recording of Deputy Insp. Donna Jones (Employee Management Division); took notes re same.	1.20	JLN
September 16, 2012	Reviewed records from Councilman Vallone as provided by City on 9-12	0.30	JLN
September 17, 2012	Reviewed JF draft letter to Court regarding adding Lt. Hanlon as deft	0.10	JLN
September 18, 2012	Reviewed JF's proposed ltr to Court re: Request to Amend	0.10	JLN
September 18, 2012	Reviewed Judge Sweet's order granting plaintiff's request for an extension of discovery deadline until January 12, 2013	0.10	JLN
September 24, 2012	Meeting w/GC and JF to discuss City deficiency letter and AS dep prep	1.75	JLN
September 24, 2012	E-mail from City re: amended complaint	0.10	JLN
September 24, 2012	E-mail response from Kretz	0.10	JLN
September 24, 2012	E-mail response to Kretz & City	0.10	JLN
September 24, 2012	E-mail to defendants re service of amended complaint	0.10	JLN
September 25, 2012	Prep AS for his dep	3.50	JLN
September 25, 2012	Meeting w/ AS & GC & JF re dep prep	2.90	JLN



September 25, 2012	E-mail from Greg R re Lauterborn dep	0.10	JLN
September 26, 2012	Meeting w/ JF & GC & AS re adjourning dep due to father's medical emergency	0.60	JLN
September 26, 2012	Brady E-mail re: service of process	0.10	JLN
September 26, 2012	E-mail from JF adjourning dep of AS	0.10	JLN
September 26, 2012	E-mail from Kretz re Lauterborn dep	0.10	JLN
September 26, 2012	E-mail to JF adjourning dep of AS	0.10	JLN
September 26, 2012	Response from B Lee re: adj.	0.10	JLN
September 26, 2012	Response from Kretz re: adj.	0.10	JLN
September 26, 2012	Review of E-mail from GC adjourning AS dep	0.10	JLN
September 28, 2012	Drafted letter to all counsel re: responses from non-parties, including Albert Vann, Fulton County and Johnstown PD; reviewed enclosures	0.20	JLN
September 29, 2012	Reviewed revised amended complaint by JF; edits and revisions to same	0.70	JLN
October 2, 2012	Listened to entire QAD interview of AS	3.30	JLN
October 4, 2012	Reviewed stipulation and Protective order for Attorneys Eyes Only Signed by Judge Sweet	0.10	JLN
October 5, 2012	Replayed 2d hour of QAD interview of AS (re: downgrading based on index scime stats); took notes re sme.	1.80	JLN
October 8, 2012	Prepared AS for deposition	6.40	JLN
October 9, 2012	Continued prepping AS for upcoming dep on Oct. 11	7.20	JLN
October 9, 2012	Reviewed cover letter w/disclosures from City	0.10	JLN
October 10, 2012	Continued prepping AS for dep tomorrow	6.70	JLN
October 11, 2012	Defended AS at his deposition	7.10	JLN
October 11, 2012	Mtg. w/client to discuss his performance at today's deposition, and next steps for moving forward	1.80	JLN
October 11, 2012	Meeting with JF, GC, AS before depo	0.50	JLN
October 12, 2012	Reviewed Citys' disclosure of plaintiff's NYS Tax Returns 2004-2009; compared same w/tax records in file.	0.40	JLN
October 12, 2012	E-mail to JF re photos used at AS dep	0.10	JLN
October 12, 2012	Email to JF to City re allowing AS access to QAD report	0.10	JLN
October 13, 2012	Began listening to IAB interviews (Sgt. Duncan/Lt. Gough); took notes re same; created summary of most important points re: Halloween nt.	3.80	JLN
October 14, 2012	Listened to Chief Marino IAB interview; Side A and Side B; took notes re: same; prepared summary of most important points	3.20	JLN
October 15, 2012	Mtg w/GC & JF re: Marino's IAB interview & inconsistencies w/claims in UF 49 & Halloween Night recording	1.20	JLN

October 16, 2012	Created chart summarizing differences b/w Marino & Lauterborne in IAB interviews.	2.10	JLN
October 16, 2012	Listened to Caughey interview (Sides A & B); took notes re: same	1.60	JLN
October 16, 2012	Reviewed City's. Priv. log (27 pgs); highlighted all claims that need to be challenged & the basis for doing so	1.60	JLN
October 16, 2012	Listened to IAB interview of Capt. Lauterborn; took notes re: same	1.40	JLN
October 17, 2012	Mtg w/JF & GC re: City's privilege claims and possible arguments/motions to defeat such claims highlights of Lauterborn interview & inconsistencies w/Marino & home invasion recording	3.30	JLN
October 17, 2012	Research re: City's "Deliberative Process" Privilege claim and best cases for defeating such a claim	3.20	JLN
October 17, 2012	Drafted letter re: opposing Mauriello's request for an additional 7 hrs to depose plaintiff.	2.40	JLN
October 17, 2012	Listened to interview w/Sgt. Hawkins; took notes re: same; compared & contrasted with Gough & Duncan.	2.10	JLN
October 17, 2012	Compiled list of all CD's from City Production - Still missing 3801/08	0.40	JLN
October 17, 2012	Dicussion w/ GC & JF re City's refusal to allow AS to see QAD file	0.40	JLN
October 18, 2012	Drafted letter to Judge to modify AEO to allow AS access to confidential materials	3.20	JLN
October 18, 2012	Listened to interviews of Det. Yeager, Lt. Delafuente & Sgt. James; took notes re same.	3.20	JLN
October 18, 2012	Research re: City's Grand Jury privilege claim regarding ADA Jim Liander & Quuens DA investigation into Schoolcraft matter	2.60	JLN
October 18, 2012	Mtg w/JF & GC re: City's Deliberative Process and Grand Jury privilege claims and best strategy for defeating same.	1.20	JLN
October 18, 2012	Listened to interview w/Assistant Chief Gerald Nelson; took notes re:same	0.70	JLN
October 18, 2012	Reviewed and edited motion permitting AS to review QAD material and opposing 3 days of depositions for AS	0.50	JLN
October 18, 2012	Read amended answer by City	0.10	JLN
October 19, 2012	Listened to IAB interviews for PO Mohabir, P.O. Gaspari, and P.O. Nowacki; took notes re same	2.90	JLN
October 19, 2012	Listened to IAB interviews of P.O. Reyes, P.O. Visconi; notes re same	1.80	JLN

October 19, 2012	Created chart summarizing differences b/w James & Yeager accounts of events at JHMC Med. ER.	1.70	JLN
October 19, 2012	T/c w/ GC/JF re: Nelson, Caughey interviews	0.30	JLN
October 19, 2012	Read answer filed by Isak Isakov	0.10	JLN
October 20, 2012	T/c w/GC & JF re: P.O. Nowacki acknowledging quota (15 c's per month) at 81 & possibly serving non-party subpoena on her for dep and discovering other possible w's at 81 re summons quota	0.90	JLN
October 21, 2012	listened to IAB interviews for Sgt. Scanlar, Lt. Crawford & Det. Barbara; took notes re same	1.80	JLN
October 22, 2012	Listened to IAB interview of Sgt. Glaudio (ESU), P.O. Sadowski and PAA Thomspen; took notes re same	2.80	JLN
October 22, 2012	Listened to IAB CD of EMT Villaverde, Sgt. Conwell & P.O. Hurly; took notes re same	1.80	JLN
October 22, 2012	Listend to IAB interviews of DI Green (CO 104) & P.O. Deck; took notes re same.	1.60	JLN
October 22, 2012	Compared DI Green statements w/Mauriello's statements re: interaction with DI Green at scene and statements re: suspension	0.40	JLN
October 23, 2012	Listened to IAB CD interviews of Sgt Weber, P.O. Lewis and P.O. Reyes	2.30	JLN
October 23, 2012	Listened to IAB interviews of P.O.'s Astor & Santana; took notes re:	1.70	JLN
October 23, 2012	Reviewed Ltr from S. Publicker responding to our letter to modify AEO to allow access by Plaintiff	0.10	JLN
October 24, 2012	Listened to IAB interview of E. Marshall, P.O. Louis, P.O. Miller and P.O. Itwaru; took notes re same	2.60	JLN
October 24, 2012	Listened to IAB interviews of Misty Schoolcraft (AS Sister); took notes re: same.	2.10	JLN
October 24, 2012	T/c w/AS & LS re their relationships with Misty Schoolcraft, her present location, last time of any contact; also gen. discussions about status of discovery and moving forward w/NYPD deps.	1.20	JLN
October 24, 2012	Motion to compel heard	0.50	JLN
October 24, 2012	Ltr from GC re: Plaintiff's Response to City's 2d Request for docs	0.10	JLN
October 25, 2012	Started review of IAB docs exchanged by City in latest prodction	1.70	JLN
October 25, 2012	Reviewed Judge Sweet's endorsement of letter filed Kretz, Jr	0.10	JLN
October 26, 2012	Continued reviewing IAB docs from latest City exchange; notes re same	4.25	JLN

October 26, 2012	Continued review of IAB documents; took notes of same.	3.80	JLN
October 27, 2012	Continued reviewing IAB docs exchanged by City	3.70	JLN
October 27, 2012	E-mail & follow up t/c w/ Eli Silverman re: case status and specific items for discovery	0.40	JLN
October 28, 2012	Further review of IAB docs; highlighted and took notes re: same	4.80	JLN
October 29, 2012	Finished review of IAB files; notes re same	4.40	JLN
October 29, 2012	Reviewed multiple Patrol Guide Procedures provided by City; highlighted and flagged most important provisions; took notes re: same	3.20	JLN
October 29, 2012	Reviewed City's production re: Vallone docs & correspondence from third parties, notes on same.	0.90	JLN
October 30, 2012	Reviewed Audio CD/Sprint Reports re: transmission made by NYPD on Oct. 31, 2009 -- 104 Pct; notes re same.	2.60	JLN
October 30, 2012	Reviewed Add'l Sprint Reports/Radio Transmissions from Nov. 1, 2009 from 104th Pct; notes re: same.	1.40	JLN
October 30, 2012	Reviewed Prop. Clerk Invoices & NYSPIN response message.	0.20	JLN
October 31, 2012	Reviewed CD's re service attempts upstate; took notes re: same	1.80	JLN
October 31, 2012	T/c w/ AS re: CD's showing attempted service & radio transmissions & AS's guidance as to what info should be focused on in transmissions	1.20	JLN
November 2, 2012	Review of case law sent by Lee re: medical defendants' liability	0.40	JLN
November 2, 2012	E-mail to GC re: Schoolcraft phone numbers	0.10	JLN
November 7, 2012	E-mail w/ GC re: service of newly named defendants	0.10	JLN
November 11, 2012	Reviewed redacted responses to Schoolcraft justice website for inclusion in discovery responses	1.10	JLN
November 12, 2012	Drafted response to City 2nd request for documents	1.20	JLN
November 12, 2012	Phone call with LS and AS re: continuing atty client relationship	0.75	JLN
November 14, 2012	Termination letter from AS	0.10	JLN
January 22, 2015	Call from LS re: reentering case as lead counsel	0.75	JLN
January 23, 2015	T/c with Adrian re: potentially taking over as lead counsel for trial	1.20	JLN
January 23, 2015	F/u call w/GC and JF about taking over case again	0.80	JLN
January 23, 2015	T/c w/GC re: potentially re-entering case & taking over for trial	0.70	JLN
January 23, 2015	Reviewed R. 68 from Oct. 2014	0.20	JLN

January 24, 2015	T/c w/AS and LS re: willingness to take over again and inclusion of C & F on our trial team	0.90	JLN
January 26, 2015	Discussion with AS & LS re my initial review of materials they sent me and the R. 68 offer, and the next steps for moving forward	1.40	JLN
January 27, 2015	Researched case law cited in City's Memo re: Unlawful entry section, 1st Amendment section and conspiracy section.	3.40	JLN
January 27, 2015	Researched case law re: MHL 9.39; 9.40; 9.41	2.80	JLN
January 27, 2015	Reviewed Plaintiff's Memo of law for Partial SJ; notes on same	0.75	JLN
January 27, 2015	Reviewed City Memo of Law for SJ; took notes re same	0.70	JLN
January 28, 2015	Legal research re: JHMC arg. for exclusion of emergency med. expert Dr. Halpren Ruder	1.60	JLN
January 28, 2015	Reviewed all SMF ("Statement of Material Facts") exhibits in support of Mauriello's motion.	1.40	JLN
January 28, 2015	Reviewed JHMC motion for SJ	0.80	JLN
January 28, 2015	Reviewed Mauriello's motion for SJ	0.60	JLN
January 28, 2015	Reviewed plaintiff's motion to Amend Second complaint & Reply Mem. re: same	0.40	JLN
January 29, 2015	Reviewed Dr. Bernier's motion for summary judgment; notes on same.	0.60	JLN
January 29, 2015	Reviewed Isakov's motion for summary judgment; notes on same	0.50	JLN
January 30, 2015	Reviewed Callan Declaration & Exhibits in Support of Motion	1.60	JLN
January 30, 2015	Telecon w/ plaintiff and Larry Schoolcraft re: case status, summary of w/ deposition testimony and taking over for Nat Smith	0.75	JLN
January 31, 2015	Reviewed City's Revised Memo of Law for Partial SJ; reviewed City's Local R. 56.1 Statement	1.10	JLN
January 31, 2015	Reviewed revised Suppl. Decl. of RS adding add'l docs in support of City SJ motion	0.20	JLN
February 1, 2015	Rev'd Plaintiff's exhibits in support of SJ motion; notes re: same	2.40	JLN
February 1, 2015	Reviewed Dep. of Sgt. James	1.90	JLN
February 1, 2015	Reviewed Dep. of Lt. Broschart.; notes on same	1.20	JLN
February 1, 2015	Read Curtis Boston Dep.; notes on same	0.60	JLN
February 1, 2015	Read Rasheena Huffman Dep.; took notes re: same	0.50	JLN
February 2, 2015	Reviewed Dep. of Sgt. Sawyer; notes on same	1.70	JLN
February 2, 2015	Further discussion w/ GC & JF re joining team to represent AS for trial	1.30	JLN
February 2, 2015	Reviewed Dep. of Lt. Hanlon; cross-referenced PX 67 (IAB interview)	0.90	JLN

February 2, 2015	Reviewed Dep. of Dr. Halpren Rudit	0.60	JLN
February 4, 2015	Reviewed 1st 1/2 of Mauriello's dep; took notes re: same	1.70	JLN
February 4, 2015	T/c AS & LS re: case status, SJ motions and trial strategy and next steps for moving forward	1.10	JLN
February 4, 2015	T/c GC & JF re: pending trial strategy and misc.evidentiary issues, and setting up meeting to discuss same in greater detail	0.90	JLN
February 4, 2015	Review of E-mail from AS re: QAD memo from Sgt. Scott	0.40	JLN
February 4, 2015	Reviewed docket sheet	0.30	JLN
February 4, 2015	Discussion w/ JF & GC re scheduling a meeting w/ Nat Smith ("NS") to discuss case status and trial prep	0.25	JLN
February 4, 2015	E-mail from AS to NS and entire team re: formally stating that we have been reinstated as lead trial counsel	0.10	JLN
February 4, 2015	E-mail from NS acknowledging Adrian Schoolcraft e-mail and suggesting mtg of entire team	0.10	JLN
February 5, 2015	T/c w. GC re: updates on discussion with Nat Smith, records and transcripts provided by Adrian and goal to streamline case for trial	0.50	JLN
February 6, 2015	Reviewed Eterno's deposition; took notes re: same	2.80	JLN
February 6, 2015	Reviewed 2nd amended complaint for refreshing mem. regarding core factual allegations, notes re: same	0.70	JLN
February 7, 2015	Reviewed all remaining Rule 56.1 Statements and Declarations; took notes re: same and prepared list of all potential exhibits all witnesses, all possible motions <i>in limine</i> based on said review	3.40	JLN
February 8, 2015	Cont'd review of 56.1 statements and supporting docs	3.70	JLN
February 8, 2015	Reviewed Silverman's deposition; took notes re same	3.20	JLN
February 9, 2015	T/c AS & LS regarding negative articles in Daily News regarding AS last week and steps moving forward	0.50	JLN
February 9, 2015	T/c GC re: issues that came up in Adrian's Dep and Larry's Dep and possible motions <i>in limine</i>	0.40	JLN
February 9, 2015	E-mail exchange with NS regarding setting up meeting and getting Broschart Dep and Exhibits from Mauriello/Marino Dep	0.10	JLN



February 10, 2015	Meeting w/ GC & JF regarding global trial strategy, witnesses to be called (or not called), exhibits to use, Rule 68 offer and next steps for moving forward.	3.50	JLN
February 10, 2015	E-mail correspondence w/AS, GC re: Defendants request to adjourn trial	0.20	JLN
February 10, 2015	E-mail correspondence w/AS, GC re: Defendants request to adjourn trial	0.20	JLN
February 11, 2015	Started review of deposition exhibits	3.40	JLN
February 11, 2015	T/c AS and LS regarding trial adjournment request by City, strategy for dealing with multiple issues raised by defendants in dep of plaintiff and overall approach to the case against NYPD	1.40	JLN
February 11, 2015	Review of witness/exhibit list from JF and discuss with GC	1.30	JLN
February 11, 2015	Reviewed JHMC memo in opp to SJ	0.30	JLN
February 11, 2015	Review of E-mail from AS regarding trial	0.10	JLN
February 12, 2015	Continued review of deposition exhibits	3.75	JLN
February 12, 2015	T/c NS and JL regarding scheduling motion practice, procedural history, and setting up meeting for next week to discuss exhibits, docs, and trial strategy	0.50	JLN
February 12, 2015	E-mail exchange with NS regarding schedule change for trial and clients consent.	0.10	JLN
February 12, 2015	T/c client regarding update on schedule, new materials he sent me, overall trial strategy	0.10	JLN
February 13, 2015	Meeting w/GC to discuss which witnesses I would be responsible for at trial; general trial strategy	1.30	JLN
February 13, 2015	Reviewed Bernier Opp to Plt. SJ motion	0.50	JLN
February 13, 2015	Reviewed City Memo of Law in opp to Pl. Mot; took notes re same	0.40	JLN
February 13, 2015	Reviewd Mauriello Aff. In Opp; notes on same	0.30	JLN
February 13, 2015	Reviewed JHMC Mem. of Law in opp to Pl. mot for SJ	0.30	JLN
February 13, 2015	T/c NS regarding missing evidence (Appeal file, EIU file, locker contents & Digital recorder)	0.30	JLN
February 13, 2015	Review of letter by Ryan Shaffer requesting more time for reply and 2 week adjournment of trial	0.10	JLN
February 13, 2015	Review of order setting trial date to April 20, 2015	0.10	JLN
February 14, 2015	Reviewed exhibit books volumes 1-3; read and highlight Dept. Adv. Interviews or Marino and Mauriello	4.90	JLN
February 14, 2015	Began review of Pl. Combined Opposition memo to City's motion, Mauriello's motion; made bullet point summary of salient points/issues	2.60	JLN



February 14, 2015	Finished review of Plaintiff omnibus response to all motions	1.80	JLN
February 15, 2015	Cont'd review of deposition exhibits	3.20	JLN
February 15, 2015	Reviewed and highlight Dr. Lamstein Dep; took notes re: same	3.10	JLN
February 15, 2015	Reviewed handwritten notes of Dr. Lamstein; took notes re: same	2.90	JLN
February 15, 2015	Reviewed Mauriello's Mem. in Opp. To Pl. Mot. For SJ	0.50	JLN
February 16, 2015	Began drafting case summary of all relevant and important facts for use at trial; began developing outline with bullet points for opening and closings, added citations for proof at trial	7.60	JLN
February 17, 2015	Finished review of deposition exhibits	1.80	JLN
February 17, 2015	T/c AS & LS regarding list of witnesses, JPTO, filing deadlines, meeting w/ NS this Friday and gen. trial strategy	0.80	JLN
February 17, 2015	E-mail AS regarding adjourned trial date and proposed meeting with NS and rest of trial than this Friday	0.10	JLN
February 17, 2015	E-mail GC & JF regarding new MIL for Queens DA findings and meeting with NS this Friday	0.10	JLN
February 18, 2015	Continued working on outline, inserting specific facts with citations to the record	2.10	JLN
February 18, 2015	T/c GC regarding meeting for Friday, important testimony from PAA Boston and issues to cover in the plaintiffs direct (re: downgrading and MIL regarding Johnstown Social Services)	0.60	JLN
February 19, 2015	Reviewed and tabbed w/ notes Mauriello Dep pp. 406-671	2.70	JLN
February 19, 2015	Reviewed IAB summary of witness statements; took notes regarding same	1.80	JLN
February 19, 2015	Reviewed Lt. Caughey's Dept Advocate testimony; took notes regarding same	1.40	JLN
February 19, 2015	T/c GC regarding best and worst pts from Huffman, Adrian's handling of downgrading issue at his deposition, fit for duty reports, and general issues that might come up at tomorrow's meeting	0.50	JLN
February 19, 2015	E-mailed GC summary of deposition section and noted it for prep of AS at trial	0.30	JLN
February 19, 2015	E-mail exchange with GC regarding points in Mauriello's motion papers	0.10	JLN

February 20, 2015	Meeting w/NS and JL regarding overall trial strategy and specific evidentiary issues and motions <i>in limine</i> , verdict sheet and <u>Monell</u> theories against JHMC and the City and allocation of trial responsibilities	3.50	JLN
February 20, 2015	Further revised and edited proposed list of exhibits and witnesses; E-mailed same to NS for today's meeting	1.60	JLN
February 20, 2015	Meeting with GC & JF prior to today's meeting with NS to go over legal issues to discuss	1.00	JLN
February 20, 2015	T/c with AS & LS re: overview of today's meeting and strategic issues that came up	0.75	JLN
February 20, 2015	T/c GC regarding summary of today's meeting	0.20	JLN
February 20, 2015	Read E-mail from AS regarding indemnification for Mauriello's counterclaim	0.10	JLN
February 21, 2015	Continued working on developing case summary of all most imp't facts for the case; incorporated facts into opening outline	3.70	JLN
February 21, 2015	Started outline of crosses for Lauterborn, Marino and Mauriello; moved relevant case facts into each cross outline; started adding relevant facts from recordings of home invasion and IAB interviews.	3.60	JLN
February 22, 2015	Started to develop specific points using documents for Lauterborn cross; continued cross reference Dept. Adv. tx and Dep tx	3.90	JLN
February 22, 2015	Continued developing opening outline and global case summary	2.60	JLN
February 22, 2015	Read and highlighted transcript of Lt. Joe Ferrara; took notes regarding same	1.60	JLN
February 22, 2015	E-mail exchange AS regarding client's request for indemnification from city for Mauriello's counterclaim	0.20	JLN
February 23, 2015	Continued working on global case summary; focused on client's background in Navy and employment with NYPD, then arrival of Mauriello and pressure for numbers	1.70	JLN
February 23, 2015	Reviewed second set of filings by all defendants (responses); took notes re: same	1.30	JLN
February 23, 2015	Follow up t/c with AS & LS re: summary of meeting with NS, points of agreement and disagreement, overall trial strategy	1.10	JLN
February 23, 2015	T/c GC regarding transcription of IAB tapes and obtaining remaining tapes from Smith today	0.10	JLN
February 24, 2015	Continued adding critical facts to case summary and opening statement	2.70	JLN

February 24, 2015	Continued drafting preliminary stages of Mauriello cross, focusing on false statements in 1st and second affidavits	1.80	JLN
February 24, 2015	Review of Eterno's dep; took notes regarding same	1.60	JLN
February 24, 2015	Reviewed Mauriello's EBT tx in Floyd; took notes re: same	1.40	JLN
February 24, 2015	Continued working on opening and case summary, continued adding critical facts to case summary	1.10	JLN
February 24, 2015	E-mail to JF re motion <i>in limine</i> issues to be covered	0.20	JLN
February 24, 2015	E-mail exchange with GC & JF regarding MIL issues presented by Eterno's testimony (and hypos asked by City)	0.10	JLN
February 24, 2015	E-mail exchange with NS regarding additional discipl. Records for Mauriello and Marino	0.10	JLN
February 25, 2015	Reviewed Marino's Dept. Adv. Trial Tx; highlight same for extraction of excerpts onto my outline	1.10	JLN
February 25, 2015	Highlighted Mauriello's Dept Adv. testimony for incorporation into cross x outline	0.70	JLN
February 25, 2015	Reviewed dep of 30 (b) (6) witness Valenti, highlighted same	0.60	JLN
February 25, 2015	Reviewed Lauterborn excerpts from Dept. Adv. transcript; added to cross x outline	0.40	JLN
February 25, 2015	Reviewed timeline of events prepared by AS; cross-referenced with our own time line; made adjustments accordingly.	0.40	JLN
February 25, 2015	E-mail correspondence re: major points for Valenti w/ GC	0.30	JLN
February 25, 2015	Reviewed AEO & confidentiality order, signed same for NS office	0.20	JLN
February 25, 2015	E-mail exchange with client regarding his mauriello/kress timeline	0.10	JLN
February 25, 2015	E-mail exchange with GC regarding highlights from Valenti dep	0.10	JLN
February 26, 2015	Worked on developing additional points for Marino cross	1.30	JLN
February 26, 2015	Meeting w/GC and JF re: outstanding items we need from trial from NS	1.10	JLN
February 26, 2015	Read e-mail from NS regarding new 2d Cir. 1st Amend. Decision (Matthews); read & highlighted decision	0.60	JLN
February 26, 2015	T/c GC regarding plaintiff's conversation with Huffman, recording of same and making transcripts of other recordings.	0.40	JLN

February 26, 2015	Phone call w/GC and Merry Soeto re: IAB and DAO recording	0.30	JLN
February 26, 2015	E-mail correspondence w/NS and GC re: IAB recorded interviews	0.20	JLN
February 26, 2015	Sent client summary of new <u>Matthews</u> decision and its impact on our case	0.20	JLN
February 26, 2015	Sent GC Summary of most important pts in <u>Matthews</u> to ensure that those points are included in Adrian's direct	0.20	JLN
February 26, 2015	T/c with Merry (NS office) and follow up E-mail exchange regarding obtaining cd's from Sgt. Scott's IAB interview	0.20	JLN
February 27, 2015	T/c with JF regarding following up with NS, IAB v. DAT transcripts, calling additional witnesses like Nelson and Valenti and Yeager	0.60	JLN
February 27, 2015	E-mail correspondence with NS and GC re: dep summaries, index of all exhibits, potential trial exhibits	0.40	JLN
February 27, 2015	E-mail exchange to NS requesting review of our exhibit list (as compiled by JN & GC) re global "universe" of all exhibits needed for trial, and made additional requests for items that will facilitate trial prep.	0.20	JLN
February 27, 2015	Reviewed preliminary list of exhibits and Indexes provided by NS	0.20	JLN
February 27, 2015	E-mail exchange with NS regarding following up on Exhibit lists, Index of CD's, Index of exhibits and EBT summaries	0.10	JLN
February 28, 2015	Revised cross-x for Mauriello adding sections from Dept. Adv. Transcript	2.80	JLN
February 28, 2015	Revised Marino cross-x draft incorporating in testimony from Dept. Adv. Transcript	2.75	JLN
February 28, 2015	Revised Lauterborn cross-x draft, adding all sections and points from Dept. Adv. Transcript	2.60	JLN
March 1, 2015	Continued working on global case summary and opening statement outline	4.20	JLN
March 1, 2015	Reviewed and highlighted Mauriello EBT Volume I; took notes re: same	2.90	JLN
March 1, 2015	Reviewed AS dep transcript Vol. I, took notes re: same	2.90	JLN
March 1, 2015	Reviewed and highlighted EBT of Captain Trainor; Cross referenced E-mails referred to in deposition	2.20	JLN
March 1, 2015	Reviewed NYPD patrol guidelines for AWOL procedures and EDP's; took notes regarding same	0.70	JLN
March 2, 2015	Reviewed AS dep Vol. II, took notes and prepared summary of most important issues raised	3.40	JLN

March 2, 2015	Continued adding to case summary and opening outline	3.20	JLN
March 3, 2015	Reviewed final volume of AS transcript; notes and bullet point summary of same	2.80	JLN
March 3, 2015	Worked on Mauriello cross-x incorporating sections from Volume II of deposition	1.10	JLN
March 3, 2015	T/c GC regarding IAB tapes, strategy for plaintiff direct and for use of home invasion audio in opening	0.50	JLN
March 4, 2015	Finished review of Bernier's dep; notes and prepared summary of most important points for use in opening.	3.20	JLN
March 4, 2015	Started reviewed of Bernier's dep. highlighted and took notes re same	2.10	JLN
March 4, 2015	Worked on adding deposition testimony into Lauterborn cross	1.60	JLN
March 4, 2015	Reviewed dep. of Dr. Patel	0.90	JLN
March 4, 2015	T/c with GC regarding Huffman cross-x points, and using Valenti deposition testimony to refute same and reassigning Sgt. James cross and obtaining a draft of direct for plaintiff from NS	0.50	JLN
March 4, 2015	Phone and E-mail w/GC re: witness list	0.30	JLN
March 4, 2015	E-mail to Scott Korenbaun ("SK") regarding jury charges, including 1st amended complaint; subst. due process, malpractice and MH 9.39	0.20	JLN
March 4, 2015	E-mail exchange GC regarding Velez PBA transcript, copy of same	0.10	JLN
March 4, 2015	E-mail exchange with GC regarding identity of other IAB investigator	0.10	JLN
March 4, 2015	E-mail to GC with revised witness list	0.10	JLN
March 5, 2015	Continued working on cross of Lauterborn	3.75	JLN
March 5, 2015	Continued working on Lauerborn cross-x	3.60	JLN
March 5, 2015	Continued working on Lauterborn cross	2.10	JLN
March 5, 2015	Reviewed veritext transcript for Lauterborn and LS	0.30	JLN
March 6, 2015	Continued working on Marino cross; all relevent text from deposition incorporated into cross	4.20	JLN
March 6, 2015	Continued working on Marino cross	3.70	JLN
March 6, 2015	Continued working on Marino cross	1.60	JLN
March 6, 2015	Discussion w/ JF & GC re proposed witnesses	0.60	JLN
March 6, 2015	E-mail exchange with client and LS regarding witness list and case update	0.10	JLN
March 7, 2015	Contined working on case summary and opening outline, incorporated all important facts for same	3.25	JLN

March 7, 2015	Reviewed veritext transcriptions of home invasion, Lauterborn call, IAB interview of Carter, Huffman and Det. Yeager; took notes re: same	2.60	JLN
March 8, 2015	Started review of Dr. Isakov's deposition; cross-referenced with his notes in the chart; made summary of salient points	2.90	JLN
March 8, 2015	Continued reviewing Dr. Isakov's dep and extracting important points for use in opening statement.	2.40	JLN
March 8, 2015	Reviewed transcripts of Dr. Dhar and Dr. Lwin; took notes re: same	1.90	JLN
March 9, 2015	Review of plaintiff's consolidated 56.1	1.00	JLN
March 9, 2015	T/c client regarding case strategy, witnesses who will be called, Queens DA findings and investigation, overall strategy for trial and next steps for moving forward	0.90	JLN
March 9, 2015	E-mails to NS regarding missing IAB tapes, Marino confidentiality section of deposition; adding exhibits to global trial list, and revising list of trial assignments for each member of team	0.40	JLN
March 9, 2015	T/c NS regarding R. 56 admissions; impressions of Lamstein; striking Lamstein affidavit; IAB recordings on Marino/Lauternorn, and meeting on Thursday	0.40	JLN
March 9, 2015	Compiled List of NYPD witnesses for trial and assigned all witnesses to team for trial; e-mailed copy of same to team	0.30	JLN
March 9, 2015	T/c w. GC regarding E-mails sent to Smith and setting up meeting with him and his trial team	0.30	JLN
March 10, 2015	Continued working on Mauriello cross-x	1.80	JLN
March 10, 2015	Reviewed NS' Rule 56.1 Statement global summary of all facts admitted; took notes re: same	1.40	JLN
March 10, 2015	T/c with AS and LS regarding Lamstein, Seroquil, Velez PBA hearing and admissibility, ESU appearance and actions, Sawyer and James actions in ER	0.75	JLN
March 10, 2015	T/c LS follow up on call and issues that arose in Larry's deposition	0.40	JLN
March 11, 2015	Continued working on Mauriello cross-x	3.70	JLN
March 11, 2015	Continued working on Mauriello cross -x	2.60	JLN
March 11, 2015	E-mail exchange with NS regarding Mauriello meds & Marino steroid trial	0.10	JLN
March 11, 2015	E-mail w/NS and GC re: exhibits and meeting	0.10	JLN
March 12, 2015	Mauriello cross-x continued	3.50	JLN
March 12, 2015	Meeting w/ GC, JF, NS, and JL re trial, motions	2.40	JLN



March 12, 2015	Meeting w/ GC to follow up with specific issues discussed at today's meeting	0.75	JLN
March 13, 2015	Reviewed Marino Disc. file, Comp stat docs regarding Mauriello and Marino, amnesty program docs, crime reporting handbook	3.75	JLN
March 13, 2015	Review of proposed jury instructions from SK	0.50	JLN
March 13, 2015	E-mail to GC re: case theory	0.20	JLN
March 14, 2015	Added all relevant parts of home invasion into Lauterborn cross-x also added appeal meeting and March 2009 conversation into cross	2.75	JLN
March 14, 2015	Continued revising and editing Lauterborn cross	2.75	JLN
March 14, 2015	Added relevant quotes from home invasion into Marino cross-x; continued revising & editing Marino cross	2.40	JLN
March 15, 2015	Continued Revising and editing Lauterborn cross	3.90	JLN
March 15, 2015	Continued revising and editing Lauterborn cross	3.75	JLN
March 16, 2015	Continued revising and editing Mauriello cross	3.10	JLN
March 17, 2015	Reviewed appeal meeting and also IAB interview of Gough, Sawyer and Dunch	1.90	JLN
March 17, 2015	Continued working on Lauterborn cross	1.60	JLN
March 17, 2015	Review of interview memo of Stretmoyers	0.20	JLN
March 18, 2015	Continued working on Lauterborn cross	1.70	JLN
March 18, 2015	Reviewed facts in SJ motions for use in opening outline; took notes regarding same	1.40	JLN
March 18, 2015	E-mail w/GC re Schoolcraft direct	0.20	JLN
March 18, 2015	E-mail exchange with NS regarding subpoenas and points for Lamstein cross	0.10	JLN
March 19, 2015	Continued reviewing PES records; reviewed file and handwritten notes of Dr. Lamstein; took notes re: same	3.70	JLN
March 19, 2015	Started review of NYPD Psychological Evaluation Section ("PES") file for AS; notes on same.	2.10	JLN
March 19, 2015	Continued work on Mauriello cross	1.70	JLN
March 19, 2015	Review of NS verdict sheet; made edits revisions to same	0.40	JLN
March 19, 2015	E-mail comments and feedback re: verdict sheet	0.30	JLN
March 19, 2015	E-mail exchange with GC regarding Jamaica	0.10	JLN
March 20, 2015	Continued working on Mauriello cross x	4.60	JLN
March 20, 2015	Continued working on Mauriello cross	2.90	JLN
March 20, 2015	E-mail exchange with rest of team regarding city's proposed adjournment of trial and other misc issues	0.20	JLN
March 22, 2015	Continued working on Mauriello cross	3.70	JLN
March 22, 2015	Continued working on Mauriello cross	2.60	JLN
March 22, 2015	Mauriello cross-x continued	2.10	JLN



March 22, 2015	Review of NS letter re Lamstein and E-mailed comments	0.40	JLN
March 23, 2015	Continued working on Mauriello cross	3.90	JLN
March 23, 2015	Meeting with GC regarding important points of Sgt/James and Sgt. Sawyer's testimony	0.40	JLN
March 23, 2015	Phone call w/GC re: James call to Lauterborn from hospital	0.40	JLN
March 23, 2015	Phone correspondence w/ GC re: AS discussion of Home Invasion	0.30	JLN
March 23, 2015	E-mail correspondence re: Schoolcraft film	0.20	JLN
March 23, 2015	E-mail exchange with NS regarding trial exhibit list and verdict sheet (uncluding JL's marshalling of facts)	0.20	JLN
March 23, 2015	Locate and send portions of AS deposition testimony to help with GC crosses	0.20	JLN
March 23, 2015	Review of Kretz supplemental interrogatories re Schoolcraft movie	0.20	JLN
March 23, 2015	E-mail exchange with NS with NS regarding Kretz's new interrogatories for Adrian regarding Schoolcraft movie	0.10	JLN
March 23, 2015	E-mail to GC portion of Lauterborn cross re: Sgt. James	0.10	JLN
March 24, 2015	Continued working on Mauriello cross	3.90	JLN
March 24, 2015	Continued work on Mauriello cross	1.70	JLN
March 24, 2015	Meeting w/ GC discussing role of Sadowsky, Miller and Sawyer; Also, QAD Huffman interview and relation to Mauriello and general trial strategy	0.60	JLN
March 24, 2015	E-mail exchange with rest of team regarding exhibit list and concerns over IAB file and impeachment documents	0.20	JLN
March 24, 2015	E-mail exchange with SK regarding issues requiring special jury charges	0.20	JLN
March 25, 2015	Continued working on Mauriello cross-x (attack counterclaim)	3.75	JLN
March 25, 2015	Continued working on Mauriello cross-x (attack counterclaim)	2.90	JLN
March 25, 2015	Continued working on Mauriello cross-x	2.10	JLN
March 25, 2015	T/c with clients regarding strategy for trial and next steps for moving forward	0.90	JLN
March 25, 2015	E-mail correspondence w/GC and NS regarding regular meetings	0.20	JLN
March 25, 2015	E-mail exchange with team regarding Yeager (retired) and setting up meeting for Fridays	0.10	JLN
March 26, 2015	Finished cross-x outline of Mauriello (counterclaim)	4.60	JLN
March 26, 2015	Continued cross-x of Mauriello	3.90	JLN

March 26, 2015	Reviewed Forest Hill Hospital records and records from Dr. Sure; took notes regarding same; forwarded same to GC	1.40	JLN
March 26, 2015	E-mail correspondence w/AS re Kretz letter	0.10	JLN
March 26, 2015	E-mail to GC re: medical records	0.10	JLN
March 26, 2015	Review of Kretz letter re film	0.10	JLN
March 26, 2015	Reviewed letter from Kress regarding Supplemental Interrogatories on Schoolcraft movie and e-mail exchange regarding same	0.10	JLN
March 27, 2015	T/c with NS, JL and GC regarding multiple issues related to prepping for trial, including exhibits, experts, jury charges, voir dire, speaking to landlord, prepping client and comp stat clips	1.90	JLN
March 27, 2015	Reviewed and edited opening statements	1.70	JLN
March 27, 2015	Phone conference with GC, NS, JL	1.00	JLN
March 27, 2015	Various E-mail correspondence GC and NS re: meeting and missing IAB Lauterborn recording	0.40	JLN
March 27, 2015	Review of Sgt. Chu and Scott memo	0.30	JLN
March 27, 2015	E-mail correspondence between GC and Merry Soete re: AS Audio Clips	0.10	JLN
March 27, 2015	E-mail to GC regarding conference call for assorted trial issues today	0.10	JLN
March 27, 2015	T/c GC regarding preparing for conference call with NS today and using Veritext software	0.10	JLN
March 28, 2015	Reviewed highlighted sections from Lamstein Dep.; cross-referenced with PES file and Lamstein notes on Schoolcraft	3.20	JLN
March 28, 2015	Reviewed GC's rough draft of AS direct	1.40	JLN
March 28, 2015	Reviewed narrative report and records of Dr. Steven Luell; cross referenced with JHMC findings re: mental health of AS.	0.60	JLN
March 28, 2015	Reviewed IAB Summary on Dr. Lamstein's interview; took notes re: same	0.40	JLN
March 29, 2015	Reviewed narrative reports of defense experts Dr. Levy, Dr. Tancredi, Dr. Dolger, & Dr. Dowling; prepared bullet point summary of key points from each report; cross-referenced with plaintiff expert, Dr. Lubit's report.	4.20	JLN
March 29, 2015	Reviewed Veritext transcripts and recordings from Home Invasion, began creating audio clips for trial	1.75	JLN
March 29, 2015	Further reviewed Dr. Sure's records and records from Forest Hills Hospital; cross referenced with notes in PES/Lamstein file.	1.40	JLN
March 29, 2015	Reviewed Dr. Halpren's Ruder's report; highlighted same	0.30	JLN
March 30, 2015	Reviewed, revised and edited Lauterborn cross-x	3.70	JLN

March 30, 2015	Added sections to opening statement	1.90	JLN
March 30, 2015	Phone call w/GC re: City's request to adjourn	0.30	JLN
March 30, 2015	T/c GC & JF regarding admissibility of tape recorded statements of persons interviewed by IAB	0.30	JLN
March 30, 2015	T/c JF regarding motion <i>in limine</i> issues and recent filings by NS regarding striking affidavit and request for conference	0.30	JLN
March 30, 2015	E-mail from city re amendment opposition	0.10	JLN
March 30, 2015	E-mail from GC w/IAB report	0.10	JLN
March 31, 2015	Continued working on various new sections on opening statement outline	3.40	JLN
March 31, 2015	Continued highlighting, revising and editing Lauterborn cross, integrated newly found info from 2nd IAB interview	2.80	JLN
March 31, 2015	E-mail correspondence w/NS and GC re trial witnesses and exhibits	0.20	JLN
March 31, 2015	E-mail exchanges with GC and NS regarding list of trial exhibits, list of trial assignments, verdict sheet from Marshall and handling Valenti	0.20	JLN
April 1, 2015	Continued working on opening statement	2.50	JLN
April 1, 2015	T/c with GC regarding important points from Valenti and Broschart and additional grounds for impeaching Huffman and difference between "administrative leave" and "lost time"	0.50	JLN
April 1, 2015	E-mail exchange regarding setting up meeting for tomorrow with trial team	0.10	JLN
April 1, 2015	E-mail re: meeting w/GC, and NS team	0.10	JLN
April 2, 2015	Working on revising and edits Marino's cross-x	3.70	JLN
April 2, 2015	Resumed working on Marino cross-x	2.60	JLN
April 2, 2015	Meeting with GC and NS team	1.90	JLN
April 2, 2015	Continued work on opening statement	1.70	JLN
April 2, 2015	Drafted and sent follow up E-mails w/NS team and GC after meeting re: exhibits	0.50	JLN
April 2, 2015	T/c with JF regarding several issues in motion <i>in limine</i> and admissibility of Marino's steroid investigation under R. 608 (b)	0.50	JLN
April 2, 2015	Follow up t/c with JF locating docs relevant for motion <i>in limine</i> , including plaintiff IAB/CCRB transcripts, Affidavits for spoliation, and Eterno deposition testimony	0.30	JLN
April 2, 2015	Reviewed proposed exhibit list from NS in prep for today's meeting. Also compiled own list of subject for discussing	0.30	JLN
April 2, 2015	T/c with GC regarding Lauterborn's second PG in September 2010 and getting recordings of same	0.10	JLN

April 2, 2015	T/c with JF regarding area of expertise and scope of testimony for Eterno	0.10	JLN
April 3, 2015	E-mail rough draft from JF and reviewed	4.40	JLN
April 3, 2015	Continued working on Marino's cross-x outline	4.25	JLN
April 3, 2015	Worked on several more sections of opening statement	3.70	JLN
April 3, 2015	Reviewed Final IAB report; took notes re: same	2.40	JLN
April 3, 2015	Worked on opening statement; adding new section on QAD findings	1.75	JLN
April 3, 2015	Reviewed plaintiff's monthly activity reports and created chart summarizing annual totals for all categories for use at trial	0.70	JLN
April 3, 2015	T/c GC regarding important point from Broschart testimony and real reason for entering apartment (illegal search and destroy evidence)	0.30	JLN
April 3, 2015	Review of revised SK jury instructions	0.20	JLN
April 3, 2015	T/c with JF regarding progress on motion <i>in limine</i> and clarification of certain factual issues	0.20	JLN
April 3, 2015	E-mail to GC including AS performance report	0.10	JLN
April 4, 2015	Reviewed revised verdict sheet and revised exhibit list sent by NS	0.40	JLN
April 5, 2015	Continued working on Marino cross	4.40	JLN
April 5, 2015	E-mail correspondence w/GC and NS re revised exhibit list	0.20	JLN
April 5, 2015	E-mail to JF re edits to motion	0.20	JLN
April 5, 2015	E-mail to GC including AS W2's	0.10	JLN
April 6, 2015	Continued working on Marino cross-x outline	3.80	JLN
April 6, 2015	Continued working on opening statement, trying to master parts of 1st A. Claim and AS stay in hospital	1.75	JLN
April 6, 2015	Reviewed JF MIL; edits to same	1.60	JLN
April 6, 2015	T/c with NS & GC regarding exhibit list, verdict sheet, important points for opening regarding Bernier and Isakov and failure of med departments to speak with IAB	1.00	JLN
April 6, 2015	Researched on Internet additional stories about Marino for potential use in cross-x (patrol o/s house and NYM Mag story); took notes re: same	0.70	JLN
April 6, 2015	Phone call w/GC and NS re: trial exhibits	0.50	JLN
April 6, 2015	Reviewed GC's draft direct of plaintiff, made notes on same	0.50	JLN
April 6, 2015	Read NS edits to MIL	0.30	JLN
April 6, 2015	E-mail to rest of team regarding specific comments and suggestions on verdict sheet	0.20	JLN
April 6, 2015	E-mail from JF re: draft Motion in Limine ("MIL")	0.10	JLN

April 6, 2015	E-mail to rest of team regarding additional exhibits that should be added to list	0.10	JLN
April 6, 2015	E-mail with C.Whitehead re: obtaining copy of Sgt. Lurch memo for use at upcoming trial.	0.10	JLN
April 6, 2015	Read e-mail and letter from defense counsel regarding application for adjournment	0.10	JLN
April 6, 2015	Reviewed e-mail exchange between GC and NS regarding PBA letter from AS to Stu London	0.10	JLN
April 7, 2015	Finished cross-x outline of Chief Marino	4.25	JLN
April 7, 2015	Review and discuss NS's letter to court re: delay of trial and announcing our rehiring w/GC	0.30	JLN
April 7, 2015	Reviewed changes to verdict sheet; additional edits and revisions to same	0.20	JLN
April 7, 2015	T/c GC & NS regarding best strategy for handling City's request for adjournment	0.20	JLN
April 7, 2015	E-mail from JF re: receiving everyone's input on MIL and incorporating changes	0.10	JLN
April 7, 2015	E-mail from JF to NS re: edits to letter	0.10	JLN
April 7, 2015	E-mail from JL re: Halpren's dep testimony re: his daughter and need to add this to MIL	0.10	JLN
April 7, 2015	E-mail from SK detailing comments on JF's draft MIL	0.10	JLN
April 7, 2015	Read City reply letter regarding adjournment	0.10	JLN
April 7, 2015	Review of SK comments on JF MIL draft	0.10	JLN
April 7, 2015	Reviewed letter to Court opposing City application; t/c with GC regarding same	0.10	JLN
April 7, 2015	Reviewed NS draft letter to Court re: adjourning trial at City's request	0.10	JLN
April 8, 2015	Continued adding sections to opening, focusing on Mental Health Law & 9.39, as well as med mal claims against hospital	1.30	JLN
April 8, 2015	T/c with GC and JF regarding trial adjournment, proposed filings, various strategies for trying to make sure trial goes on April 20	0.75	JLN
April 8, 2015	T/c GC regarding points from Duncan deposition regarding ESU, meat cleaver and travelling to Johnstown	0.20	JLN
April 8, 2015	T/c NS and GC re writing a supplemental letter to Court regarding trial date issues	0.20	JLN
April 8, 2015	E-mail exchanges amongst counsel re: availability for Court conf. on 4/13	0.1	JLN
April 8, 2015	E-mail from GC to NS stressing need to ensure trial goes forward as planned & does not get delayed	0.10	JLN

April 8, 2015	E-mail from GC to NS stressing need to ensure trial goes forward as planned and does not get delayed	0.10	JLN
April 8, 2015	E-mail from NS re: proposing team meeting for this Friday	0.10	JLN
April 8, 2015	E-mail from NS stressing importance of Duncan as a witness & his testimony re: trying to get AS to resign	0.10	JLN
April 8, 2015	E-mail NS Confirming Court conference for 4/13 and advising of his new address	0.10	JLN
April 8, 2015	E-mail response suggesting meeting take place after conference on Monday	0.10	JLN
April 9, 2015	Reviewed Dep. of William Gough; notes on same	2.10	JLN
April 9, 2015	Reviewed Dep. of Kurt Duncan; took notes re: same	1.80	JLN
April 9, 2015	Reviewed Dep. of Joe Ferrara; cross-referenced w/e-mail exchanges b/w JLN and JF.	0.90	JLN
April 10, 2015	Reviewed Schoolcraft Graham Raymond materials made summary of most important points from clients' e-mail correspondence and chronological summary	1.40	JLN
April 10, 2015	E-mail exchange w/ NS and rest of team regarding developments on trial schedule (criminal trial adjourned to Fall)	0.10	JLN
April 10, 2015	E-mail from NS to GC re: mistakes in home invasion transcript that need to be fixed	0.10	JLN
April 10, 2015	E-mail NS to GC re: 2 other changes to transcript for home invasions	0.10	JLN
April 10, 2015	Reviewed e-mail exchange b/w NS & Court re: purpose of conf. on Monday is for scheduling & not for substantive issues	0.10	JLN
April 10, 2015	T/c w/ client regarding updates on trial status	0.10	JLN
April 11, 2015	Finished review of QAD Report; made summaries of most egregious examples of downgrading; made separate summary of two specific instances of misconduct of Mauriello re: manipulation of crime stats	4.25	JLN
April 11, 2015	Started to review final QAD Report and attachments; took notes re same	2.40	JLN
April 11, 2015	Continued to review final QAD Report	2.10	JLN
April 11, 2015	E-mail correspondence w/ GC and NS re: trial date and schedule	0.20	JLN
April 11, 2015	E-mail w/NS re Home Invasion Transcript	0.10	JLN
April 12, 2015	Compiled list of all trial exhibits to be used on my section of trial.	0.70	JLN

April 13, 2015	T/c with plaintiff regarding today's conference and Judge's proposed dates and impact this will have and variety of trial issues	1.25	JLN
April 13, 2015	Conference before Judge Sweet regarding adjournment of trial and next steps for moving forward	1.00	JLN
April 13, 2015	Meeting w/ GC and JF re new trial date	0.50	JLN
April 13, 2015	E-mail w/veritext re: changes to Home Invasion transcript	0.20	JLN
April 13, 2015	E-mail from NS to RS re: Lauterborn's PG & missing half of interview	0.10	JLN
April 14, 2015	Reviewed e-mails and attachments from SK regarding latest versions of jury charges	0.20	JLN
April 14, 2015	T/c w/ SK regarding adjournment of trial and status of jury charges	0.20	JLN
April 15, 2015	Reviewed Lamstein's new "draft" type written notes & compared w/ old type written notes; prepared list summarizing differences between them	0.40	JLN
April 15, 2015	Review of newly produced Lamstein notes	0.20	JLN
April 15, 2015	E-mail & attached letter re: illness to PO Boston & unavailability for trial	0.10	JLN
April 15, 2015	E-mail from NS relaying another call from Scheiner re: city agreeing to pay for mediator	0.10	JLN
April 15, 2015	E-mail from NS to team forwarding Lamstein's "newly discovered" draft notes	0.10	JLN
April 15, 2015	E-mail from NS to team recapping his call with Scheiner requesting adjournment to November date	0.10	JLN
April 15, 2015	E-mailed w/GC and NS re mediation offer from the City	0.10	JLN
April 15, 2015	Letter from Scheiner to NS re: draft document from Lamstein	0.1	JLN
April 15, 2015	Phone call w/ GC re Boston unavailability	0.10	JLN
April 15, 2015	Reviewed E-mail and letter regarding PAA Boston's medical condition	0.10	JLN
April 17, 2015	Telecon w/ rest of trial team regarding City's proposal for mediation and best strategy for responding to same	0.60	JLN
April 17, 2015	Conference call with team re: best strategy for responding to City latest "offer"	0.50	JLN
April 17, 2015	T/c with GC & JF following up on telecon and discussing settlement position vs. going to trial	0.40	JLN
April 17, 2015	E-mail from NS explaining Scheiner's view that we cannot prepare for trial & negotiate at same time	0.10	JLN



April 17, 2015	E-mail from NS relating exact terms of last settlement demand	0.10	JLN
April 17, 2015	E-mail from Scheiner to NS re: locating complete copy of Lauterborn type	0.10	JLN
April 17, 2015	E-mail to NS responding to City's "offer" re: mediation & adjusting adjourning trial	0.10	JLN
April 17, 2015	Reviewed e-mail from NS describing City's "offer" to mediate and response to same	0.10	JLN
April 20, 2015	E-mail exchange with team regarding City's settlement position and request for mediation with out any counter offer	0.30	JLN
April 21, 2015	E-mail from NS to team re: City's letter to Court	0.10	JLN
April 21, 2015	Review of letter from City requesting more time for MIL	0.10	JLN
April 21, 2015	Reviewed City's letter to Judge Sweet seeking to ensure that trial does not go forth on May 4, 2015	0.10	JLN
April 22, 2015	E-mail exchanges re: NS letter response to City latest request to adjourn trial	0.10	JLN
April 23, 2015	T/c LS regarding status of case, Judge Sweet's decision on SJ and likely impact on case once it comes down & City's multiple settlement overtures in the past two weeks	0.75	JLN
April 27, 2015	E-mail from Scheiner re: City latest disclosures	0.1	JLN
April 28, 2015	Letter to NS from Scheiner re: AS employee evaluation & complete recording of Lauterborns 2nd Go - 15 Interview	0.1	JLN
April 29, 2015	E-mail exchanges with NS and GC regarding mock trial and bringing AS down to NYS to prepare	0.10	JLN
May 5, 2015	Read and review Ct's Opinion on SJ; took notes re: same; prepared list of claims which still must be tried & fact issues to be decided	1.60	JLN
May 5, 2015	Discussion w/GC and JF re SJ decision	0.50	JLN
May 5, 2015	E-mail w/GC re Judge Sweet's Summary Judgment opinion	0.10	JLN
May 8, 2015	Discussion w/ GC & JF re SJ decision and impact on trial and motion in lim	0.80	JLN
May 10, 2015	Listened to Lauterborn's 2nd GO interview; notes re: same	0.9	JLN
May 12, 2015	Meeting w/NS team GC and JF pre-conf	1.50	JLN
May 12, 2015	Team meeting following conf.	1.25	JLN
May 12, 2015	Conference before Judge Sweet regarding setting new trial date and schedule for pre-trial filings	1.00	JLN
May 13, 2015	T/c client regarding updates on yesterday's status/pretrial conference with Judge Sweet	1.20	JLN
May 13, 2015	E-mail correspondence w/SK re conference	0.10	JLN

May 14, 2015	E-mail correspondence amongst all parties re: pretrial submissions schedule	0.10	JLN
May 14, 2015	E-mail from Alan Sheiner re: proposed briefing schedule for motions in limine	0.10	JLN
May 14, 2015	E-mail re: pretrial submissions schedule	0.10	JLN
May 15, 2015	Further e-mail w/ all parties re: pretrial submissions schedule	0.10	JLN
May 18, 2015	Review of letter motion filed by City re: JPTO dates	0.10	JLN
May 21, 2015	E-mail from NS re settlement offer from City	0.10	JLN
May 22, 2015	T/c with clients re: update on settlement	0.75	JLN
May 28, 2015	E-mail GC re Veritext bill	0.10	JLN
May 29, 2015	E-mail w/GC and NS re: City bifurcation request	0.20	JLN
May 29, 2015	E-mail exchange w/ all parties re: pretrial submissions schedule	0.10	JLN
June 1, 2015	Reviewed NS draft reconsideration	0.40	JLN
June 1, 2015	Reviewed draft of Plaintiff's motion for Reconsideration	0.20	JLN
June 2, 2015	Read City's motion to reconsider bifurcation on <u>Monell</u> claim	0.30	JLN
June 2, 2015	Read memo of law in Support of defendant Mauriello's motion for Reconsideration	0.30	JLN
June 2, 2015	Review of city's motion to bifurcate	0.20	JLN
June 3, 2015	Review of E-mail correspondence w/court re motions	0.20	JLN
June 3, 2015	Reviewed plaintiff's motion for reconsideration as filed	0.20	JLN
June 4, 2015	Reviewed Mauriello's motion for reconsideration	0.50	JLN
June 5, 2015	Reviewed Request for Extension	0.10	JLN
June 6, 2015	T/c with AS & LS re: case update, next Court filings & general strategy going forward	0.1	JLN
June 9, 2015	Order granting extension of time	0.10	JLN
June 10, 2015	Phone call with Schoolcrafts and GC re: Mauriello recon. and bifurcation	0.80	JLN
June 16, 2015	E-mail from NS requesting assistance in responding to City's reconsideration motion	0.10	JLN
June 22, 2015	T/c w/ AS & LS re: case status, pending motion for reconsideration & impact on case if we cannot call Dr. Halpren as witness	0.9	JLN
June 22, 2015	Another e-mail from NS re: responding to City's Motion for Reconsideration	0.10	JLN
June 22, 2015	E-mail exchange between NS & W. Kretz re: respective dates to respond to motions	0.10	JLN
June 22, 2015	E-mail from NS to defense counsel seeking an additional week for opposition to reconsider	0.10	JLN

June 23, 2015	E-mail from NS to team regarding Scheiner's e-mail on bifurcation reconsideration	0.10	JLN
June 23, 2015	E-mail from Scheiner to NS re: putting Monell bifurcation & motions for reconsideration on two different tracks	0.10	JLN
June 24, 2015	E-mail & attached letter to Judge Sweet re: adjusting briefing schedule	0.10	JLN
June 24, 2015	Review of E-mail correspondence w SK re: motion schedules	0.10	JLN
June 25, 2015	E-mail exchanges w/ all counsel re: adjustment to briefing schedule	0.10	JLN
June 25, 2015	E-mail from NS enclosing letter to Court w/ agreed upon dates	0.10	JLN
June 29, 2015	E-mail & draft memo of law on bifurcation	0.20	JLN
June 29, 2015	E-mail from JF to team adding case law to oppose bifurcation	0.10	JLN
June 29, 2015	E-mail to NS /JL adding case law for opposing bifurcation	0.10	JLN
July 2, 2015	E-mail from Scheiner to all counsel re: City's latest doc production	0.10	JLN
July 2, 2015	Letter from Scheiner to NS re: latest City productions	0.1	JLN
July 2, 2015	Request to NS to put City's new materials on disc.	0.10	JLN
July 3, 2015	E-mail from NS forwarding City's latest production	0.10	JLN
July 3, 2015	E-mail to Scheiner from NS confirming that City new production consists of 511 pages	0.10	JLN
July 6, 2015	Review of opposition to defendants' reconsideration motions	0.70	JLN
July 6, 2015	E-mail exchange between JL & A. Scheiner re: providing City with all of the data expert relied on by Eterno & Silverman	0.10	JLN
July 6, 2015	E-mail exchanges re: writing to Court & clarifying correct due date	0.10	JLN
July 6, 2015	E-mail from NS to Scheiner requesting explanation as to where new City docs came from	0.10	JLN
July 6, 2015	Letter from Scheiner re: correcting typo in previous Bates number correspondence	0.1	JLN
July 7, 2015	E-mail from Scheiner re: ECF filing errors	0.1	JLN
July 7, 2015	E-mail request from Scheiner seeking to adjourn City's Reply on <u>Monell</u>	0.10	JLN
July 7, 2015	Review of E-mail correspondence between NS team re Eterno & Silverman	0.10	JLN

July 8, 2015	Reviewed City's latest disclosure of Schoolcraft med records, screening tests to become NYPD officer; LOD reports for AS & other docs related to AS's prior LOD claims; took notes re same.	1.80	JLN
July 10, 2015	Read Reply in Further Support of motion for Bifurcation filed by City	0.10	JLN
July 11, 2015	T/c w/ AS & LS re: NS opp to reconsider motions & summary of arguments re: same & likely outcome, as well as overall status of case and trial prep	1.10	JLN
July 13, 2015	Review of JHMC to NS motion for recon	0.30	JLN
July 13, 2015	Read opposition brief to Plaintiff's motion for Reconsideration filed by JHMC	0.10	JLN
July 13, 2015	Reviewed NS letter so ordered by Judge Sweet re: a modification to briefing schedule	0.10	JLN
July 15, 2015	Reviewed Dep of K. Finnegan (30(b)(6) -- Topic C, and reviewed primary dep exhibit (old performance guide); took notes re same	2.40	JLN
July 15, 2015	E-mail response from NS to all counsel re: adjourn filing dates but keep JPTO date	0.1	JLN
July 16, 2015	Read City's letter motion for more time on motions for Reconsideration	0.10	JLN
July 17, 2015	E-mail exchange between JL and NS re: John Eterno	0.20	JLN
July 17, 2015	Sent GC E-mail correspondence between myself and NS re: John Eterno	0.10	JLN
July 17, 2015	Reviewed Judge Sweet's order granting the City's motion	0.10	JLN
July 18, 2015	T/c w/ AS & LS re: JHMC opp & City's bifurcation argument & anticipated reply arguments	1.2	JLN
July 18, 2015	Reviewed NS prior letter motion re: Weiss EIU file, Sgt. Purpi and cont'd dep of Dr. Patel	0.20	JLN
July 20, 2015	Sent GC E-mail correspondence between Myself and NS re: John Eterno	0.10	JLN
July 21, 2015	Started reading "NYPD Tapes" (book on Schoolcraft case) for additional facts & evidence & themes to use at trial.	2.40	JLN
July 21, 2015	E-mail exchanges amongst team re: setting up next meeting for trial team	0.1	JLN
July 22, 2015	Watched new Schoolcraft documentary (Eterno appears)	0.3	JLN
July 22, 2015	E-mail re: new Schoolcraft "documentary"	0.1	JLN
July 23, 2015	Cont'd reading NYPD Tapes; took notes re: same	3.25	JLN
July 23, 2015	Review of reply memo for AS	0.70	JLN
July 23, 2015	Review of City Defendants' reply affirmations recon motions	0.50	JLN

July 23, 2015	Read City's Reply Memo of Law in Support of motion for Reconsideration	0.20	JLN
July 23, 2015	Read Kretz' reply affirmation for Reconsideration of Judge Sweet's Order	0.10	JLN
July 23, 2015	Reviewed AS letter requesting Extension of time	0.10	JLN
July 24, 2015	Meeting with rest of trial team regarding various strategic issues and timeline for pre-trial filings	2.90	JLN
July 24, 2015	T/c with JF & GC regarding issues to discuss at meeting today with rest of trial team	0.50	JLN
July 24, 2015	Reviewed reply memorandum from Mauriello; took notes re: same	0.40	JLN
July 24, 2015	Follow up e-mail to trial team re trial docs	0.30	JLN
July 24, 2015	Reviewed reply memorandum from City in further support SJ; took notes re: same	0.30	JLN
July 24, 2015	Post meeting discussion with JF and GC regarding issues raised during today's meeting	0.25	JLN
July 24, 2015	Reviewed NS reply memo of law in Support of motion for Reconsideration	0.20	JLN
July 24, 2015	E-mail exchanges re: JPTO deadline	0.1	JLN
July 25, 2015	T/c with AS & LS re: City's reply & Mauriello's reply & NS reply & overall sense of which arguments are strongest & most likely to prevail; updated them re: team's meeting yesterday	0.7	JLN
July 25, 2015	E-mail exchange from NS re: adding Polanco to JPTO	0.1	JLN
July 26, 2015	Cont'd reading NYPD Tapes; took notes re: same	2.10	JLN
July 27, 2015	E-mail w MS re: master exhibit list	1.75	JLN
July 27, 2015	E-mail GC re Polanco as witness	1.70	JLN
July 27, 2015	Read NS letter motion for extension on JPTO	0.10	JLN
July 28, 2015	Reviewed revised Jury Charges from SK; made notes re: same	0.60	JLN
July 28, 2015	Reviewed revised witness list; made edits/revisions to same	0.20	JLN
July 29, 2015	E-mails with Schoolcraft team re: settlement	0.10	JLN
July 30, 2015	Reviewed and highlighted first volume of Lt. Caughey's deposition for extraction and use in cross x outline; took notes re: same	2.30	JLN
July 30, 2015	Phone call w/GC and NS re settlement	0.40	JLN
July 30, 2015	T/c GC regarding settlement position & response to City's settlement overtures	0.40	JLN
July 30, 2015	Read City's joint letter to Court re: striking plaintiff's reply memo of law	0.10	JLN
July 30, 2015	Read letter motion to strike reply by City	0.10	JLN
July 31, 2015	T/c conference with defense counsel	0.50	JLN
July 31, 2015	Reviewed Notice of Appearance by Kavin Thadani on behalf of City	0.10	JLN

August 1, 2015	Finished NYPD Tapes; incorporated notes of additional facts & salient themes into case summary	1.80	JLN
August 1, 2015	T/c w/ AS re: meeting together on Tuesday & preparing list of issues to discuss at our meeting	0.3	JLN
August 4, 2015	Meeting with AS to discuss case & best strategy for moving forward & preparing for trial	4.75	JLN
August 4, 2015	Travel back to NYC from Johnstown 3.40	1.75	JLN
August 4, 2015	Traveled to Johnstown to meet client 3.50	1.70	JLN
August 4, 2015	Phone call w/GC re: witness list and exhibit list	0.40	JLN
August 4, 2015	Review of NS revised witness and exhibit list	0.30	JLN
August 4, 2015	T/c GC regarding discussion with NS	0.20	JLN
August 5, 2015	Continued conversations with NS regarding exhibits & witnesses	1.00	JLN
August 5, 2015	Multiple phone calls w/ GC & NS regarding JPTO exhibits and witnesses	0.90	JLN
August 5, 2015	Preliminary review of City's JPTO and hospital JPTO	0.30	JLN
August 5, 2015	E-mail from NS re: reaching him when he is out of town next week	0.1	JLN
August 6, 2015	Continued review of JPTO submissions by all parties; took notes re: same	0.60	JLN
August 7, 2015	T/c with GC, JL & NS regarding multiple issues in defendants' respective JPTO's	1.00	JLN
August 7, 2015	E-mail from NS enclosing Mauriello's production (Docs # 61-362); reviewed same	0.7	JLN
August 7, 2015	T/c w/ GC in which GC recapped latest settlement offer as relayed by Scheiner to NS	0.3	JLN
August 7, 2015	E-mail exchange with NS regarding City's latest "offer"	0.10	JLN
August 7, 2015	E-mail from NS re: Bernier & Isakov JPTO	0.1	JLN
August 7, 2015	E-mail from NS re: getting a response to City latest "offer"	0.1	JLN
August 7, 2015	E-mail to NS seeking confirmation of exact terms of City's new offer	0.1	JLN
August 7, 2015	NS e-mail explaining City's "new" back pay offer (extending it to Dec. 2015)	0.1	JLN
August 8, 2015	"offer"	0.90	JLN
August 8, 2015	Reviewed Mauriello's production; notes re: same	0.6	JLN
August 8, 2015	T/c w/ AS & LS re: City latest "offer" and what conditions would need to be met (monetary & otherwise) for case to settle	0.1	JLN
August 9, 2015	E-mail correspondence re: JPTO and motion deadlines	0.10	JLN

August 10, 2015	Highlighted and made edits and notes on Trainor's deposition outline for purposes of building cross-x outline	3.40	JLN
August 10, 2015	Reviewed cross-x outlines of Captain Lauterborn, DI Mauriello and Marino to make sure all documents on JPTO are accounted for	2.80	JLN
August 10, 2015	Continued highlighting Trainor's Dep for cross-x excerpts	1.20	JLN
August 10, 2015	E-mail correspondence re: JPTO and motion deadlines	0.10	JLN
August 10, 2015	E-mail response from NS re: my recap of conversation with AS	0.1	JLN
August 10, 2015	E-mail to NS recapping discussion w/ AS this past weekend	0.1	JLN
August 11, 2015	Made revisions and edits to base cross-x outline for Sgt. Weiss	2.10	JLN
August 11, 2015	Review of City defendants JPTO	0.60	JLN
August 11, 2015	Review of new discovery served by City	0.20	JLN
August 11, 2015	E-mail from NS to all counsel w/ consolidated shell of JPTO; reviewed same	0.1	JLN
August 11, 2015	E-mail from Scheiner with two additional docs inadvertently omitted from previous disclosures	0.1	JLN
August 12, 2015	Reviewed portion of opening outline regarding treatment in ER & interactions with James & Sawyer and Yeager	0.70	JLN
August 12, 2015	Reviewed NYPD memo re: Amnendment to Quota bill	0.30	JLN
August 13, 2015	Reviewed portion of opening outline regarding MHL 9.39 and Bernier decision to involuntary commit; reviewed section relating to QAD; reviewed section regarding harrassment upstate	1.40	JLN
August 13, 2015	Reviewed NS letter to Court seeking 1 extra week for JPTO; also reviewed opposition e-mails by defense counsel to same; reviewed Mauriello's response to plaintiff's JPTO	0.40	JLN
August 13, 2015	E-mail from Scheiner w/ spreadsheet re: City JPTO objections	0.1	JLN
August 13, 2015	Read order of Judge Sweet granting plaintiff's extgension parties	0.10	JLN
August 13, 2015	Review of correspondence all parties re: JPTO	0.10	JLN
August 13, 2015	Reviewed Judge Sweet's order Defendants' motion to strike Plaintiff's reply	0.10	JLN
August 13, 2015	Reviewed NS letter motion to Court for extension	0.10	JLN
August 14, 2015	Reviewed consolidated JPTO; made notes re: same	0.70	JLN



August 14, 2015	Review of Lauterborn's transcribed audio interview; 2nd IAB interview took notes re: same	0.60	JLN
August 14, 2015	Reviewed multiple E-mail exchanges between NS and counsel regarding JPTO and best way to proceed	0.30	JLN
August 14, 2015	E-mail from NS asking team for input in responding to Scheiner's letter/JPTO	0.1	JLN
August 14, 2015	E-mail re: City filing JPTO without our input	0.10	JLN
August 14, 2015	E-mails among team re: MIL due date	0.1	JLN
August 14, 2015	Read City's letter reply to Court in further support of the City's motion to strike plaintiff's reply	0.10	JLN
August 14, 2015	Read City's letter to Court re: Defendants' JPTO	0.10	JLN
August 14, 2015	Review of letter to Court filed by Scheiner re: Defendants' JPTO (w/o plaintiff's portion)	0.1	JLN
August 15, 2015	Reviewed City's latest disclosures, incl. certified docs from Hertzler Sure, M.D., multiple photos and info relating to rifle found in Schoolcraft's apartment; LS's prior lawsuit against Montgom. Cty; QAD investigations that resulted in discipline for officers; additional PG guidelines and IAB Guidelines; forensic manual for Mental Hygiene Law	3.40	JLN
August 15, 2015	T/c w/ AS & LS re: City's JPTO filing & attorney's motion to strike reply & several updates on trial prep	0.9	JLN
August 16, 2015	Started work on Sgt. Weiss cross-x outline	4.60	JLN
August 16, 2015	Internet research re: rifle identified by City (9 MM Carines).	1.90	JLN
August 16, 2015	Reviewed defendants JPTO filing; took notes re: same	0.60	JLN
August 17, 2015	Continued Weiss cross-x outline	5.60	JLN
August 17, 2015	Continued working on Sgt. Weiss cross-x outline	4.25	JLN
August 17, 2015	Reviewed additional Patrol Guide sections disclosed by City (15147-15170); took notes re: same	1.40	JLN
August 17, 2015	Read City's letter to Court re: Opposition to Plaintiff's August 13th Request to Modify the JPTO Filing Deadline	0.10	JLN
August 18, 2015	Phone call and e-mail w/ GC re Huffman	0.30	JLN
August 18, 2015	T/c w/ Alan Sheiner & Cheryl Shammass regarding City's latest settlement offer and plaintiff's position regarding same	0.20	JLN
August 18, 2015	Read City's letter to Court re: opposition to plaintiff's request to modify the deadline of the filing of the JPTO	0.10	JLN

August 18, 2015	Read City's letter to Court re: requiring the plaintiff to identify a single police practices expert	0.10	JLN
August 18, 2015	Reviewed NS letter reply to motions for extension of time	0.10	JLN
August 18, 2015	Reviewed NS reply to City's letter/JPTO	0.1	JLN
August 19, 2015	T/c with plaintiff regarding City latest settlement offer and City's message that window to settle will close this week and will not re-open	0.40	JLN
August 20, 2015	Reviewed City's latest disclosure (Office of Mgt Analysis & Planning Reference Guide); took notes re same.	1.80	JLN
August 20, 2015	Read NS e-mail to Scheiner re: his misleading submission to Court	0.1	JLN
August 20, 2015	Reviewed NS letter to Court re: JPTO	0.10	JLN
August 20, 2015	Scheiner e-mail rejecting service by fax	0.1	JLN
August 20, 2015	Scheiner re: e-mail responding to NS "misleading submission"	0.1	JLN
August 21, 2015	T/c with NS regarding Larry's serious medical condition, discussion w/ Alan Sheiner & CS regarding City's latest settlement and regarding status of cross-x outlines and JPTO issues	0.80	JLN
August 21, 2015	T/c NS re: several trial prep issues & outstanding work that still needs to be done & update on LS medical condition	0.7	JLN
August 21, 2015	E-mail all parties re MIL due date	0.10	JLN
August 21, 2015	Read Alan Sheiner's letter to Court regarding striking plaintiff's JPTO	0.10	JLN
August 21, 2015	Read various e-mails amongst counsel regarding motion <i>in limine</i> schedule	0.10	JLN
August 21, 2015	Scheiner letter to Court attaching City's response to August 20th letter by NS	0.1	JLN
August 21, 2015	Sent NS summary exhibit that we created regarding Schoolcrafts performance in 2008	0.1	JLN
August 22, 2015	T/c w/ AS & LS re: City's letter seeking to limit us to one police expert & city opp. to our request to modify JPTO deadlines & general updates on status of cross examinations	0.7	JLN
August 24, 2015	Reviewed GC's cross-x outline on Gough; took notes re: same	0.70	JLN
August 24, 2015	Reviewed GS's cross outline on Yeager; took notes re: same	0.40	JLN
August 24, 2015	Review of NS e-mail re upstate visits to AS	0.20	JLN
August 24, 2015	NS e-mail re: receipt of my crosses & dates when he will exchange Bernier & Isakov crosses	0.1	JLN
August 24, 2015	Sent GC cross outlines for review	0.10	JLN
August 25, 2015	Reviewed JPTO; edits and revisions to same	0.60	JLN

August 25, 2015	NS e-mail & letter to Court respond to Scheiner August 18 & August 21 letters re: # of police experts	0.1	JLN
August 25, 2015	Reviewed filing by NS responding to various arguments by defendants on JPTO exhibits and witnesses	0.10	JLN
August 26, 2015	Began work on Trainor Cross-x outline using JM preliminary outline	2.70	JLN
August 26, 2015	Reviewed GC draft cross of Det. Yeager & Boston; highlighted & made edits to same	1.40	JLN
August 26, 2015	Drafted points to discuss w/GC re: trial strategy	0.70	JLN
August 26, 2015	Sent GC more cross outlines for review	0.10	JLN
August 27, 2015	Continued working on Trainor cross-x	6.40	JLN
August 27, 2015	Continued working on Trainor cross-x	4.80	JLN
August 28, 2015	Reviewed GC draft cross x of Sgt. Huffman; extracted section re: Mauriello ordering Pl. back after Huffman approved (worked into Mauriello cross-x as new section); made edits/revisions.	1.80	JLN
August 28, 2015	Reviewed GC draft of Duncan cross; edits & revisions to same	1.80	JLN
August 28, 2015	Reviewed GC draft cross of Sgt. Sawyer; highlights, edits, revisions to same	1.30	JLN
August 28, 2015	Sent GC cross outlines for review	0.10	JLN
August 29, 2015	Reviewed GC draft cross of Lt. Broschart; edits/revisions to same	1.90	JLN
August 29, 2015	Reviewed GC's draft Valenti cross; edits/revisions to same	0.60	JLN
August 30, 2015	Contined working on cross-x of Capt. Trainor; cross-referenced BNIU file for several additional points	6.75	JLN
August 30, 2015	Started working on Lt. Caughey cross-x	4.25	JLN
August 30, 2015	Reviewed GC draft of Gough cross; edits/revisions to same	1.90	JLN
August 31, 2015	Contined working on cross-x of Lt. Caughey	6.40	JLN
August 31, 2015	Reviewed GC draft of Sgt. James cross; edits to same & extracted relevant points for opening statement	2.40	JLN
August 31, 2015	F/u telecon with NS re: schedule	0.4	JLN
August 31, 2015	Conference call w/ all counsel to clerk re: pending motions	0.3	JLN
September 1, 2015	Continued working on Caughey cross-x	8.20	JLN
September 1, 2015	Sent GC cross outlines for review	0.10	JLN
September 2, 2015	Cross outline of Lt. Caughey	7.60	JLN
September 2, 2015	Continued working on Trainor cross-x	1.40	JLN
September 3, 2015	Review of City letter re: JPTO schedule	0.20	JLN
September 3, 2015	NS response to Scheiner re: request for telecon	0.1	JLN

September 3, 2015	Request from Scheiner to have telecon re: settlemt	0.1	JLN
September 4, 2015	Continued working on Caughey cross-x	4.60	JLN
September 4, 2015	Continued working on Trainor cross-x	4.60	JLN
September 4, 2015	T/c w/ NS regarding his conversation with Alan Scheiner regarding City's latest settlement offer; spoke to GC regarding same	0.60	JLN
September 4, 2015	E-mail from NS re: City letter to Court treating 9-17-15 as new date for MIL's	0.1	JLN
September 4, 2015	Reviewed City letter to Court re: Court's failure to decide pending motions	0.1	JLN
September 5, 2015	T/c with AS and LS regarding City's latest settlement offer	0.70	JLN
September 6, 2015	Finished Trainor cross-x	7.10	JLN
September 6, 2015	T/c w/ LS regarding City's settlement offer and requirements for resolving matter	0.75	JLN
September 7, 2015	Continued working on Caughey cross-x	6.25	JLN
September 8, 2015	T/c with JF & GC recapping discussion with defense counsel and clients over the weekend	0.60	JLN
September 8, 2015	T/c with NS, GC and JF regarding best strategy for handling settlement discussions with the City	0.60	JLN
September 8, 2015	T/c with AS and NS regarding City's latest settlement offer and plaintiff's response to same	0.40	JLN
September 8, 2015	T/c with NS & Alan Sheiner following up on City's offer and discussions earlier today	0.40	JLN
September 8, 2015	Phone call w/GC re Schoolcrafts	0.30	JLN
September 8, 2015	F/u conversation with NS to discuss last conversation with defense counsel regarding City's 3/4 disability analysis	0.20	JLN
September 8, 2015	E-mail from Scheiner re: getting back to him on City's settlement proposal	0.1	JLN
September 8, 2015	E-mail from Scheiner seeking plaintiff's response to latest City offer	0.1	JLN
September 9, 2015	Started work on cross-x Lamstein	1.7	JLN
September 9, 2015	E-mail from Scheiner to NS & JN re: following up on settlement	0.1	JLN
September 10, 2015	Reviewed Lamstein's PES file & her handwritten notes for incorporation into cross	2.6	JLN
September 10, 2015	Reviewed Lamstein Declaration Lamstein dep corrections & Lamstein original typed notes vs. "draft" notes exchanged this summer compared with dep testimony for use in cross-x	2.4	JLN
September 10, 2015	Reviewed Lamstein's IAB interview compared w/ dep testimony for developing grounds to explore in cross	1.8	JLN
September 10, 2015	Reviewed Lamstein VM to AS on 10-31-09 to incorporate into cross	0.3	JLN

September 10, 2015	E-mail from GC recapping his conversation with AS yesterday re: clients position re: lack of 3/4 pension	0.1	JLN
September 10, 2015	NS e-mail describing disability options	0.1	JLN
September 10, 2015	NS response to GC's e-mail re: summary plan	0.1	JLN
September 10, 2015	Reviewed Court's endorsement of plaintiff's letters dated August 18, 2015 and August 21, 2015	0.10	JLN
September 11, 2015	Continued working on Lamstein cross-x	3.2	JLN
September 11, 2015	T/c w/ AS & LS re: City latest offer & pros and cons of same	0.9	JLN
September 11, 2015	Phone calls with NS and GC re City settlement offer	0.80	JLN
September 11, 2015	Teleconwith NS & Scheiner City is willing to increase offer for P&S	0.8	JLN
September 11, 2015	E-mail from NS & Scheiner re: our availability to speak later this a.m.	0.1	JLN
September 11, 2015	E-mail from NS to Scheiner re: conference call for today at 11:00 am	0.1	JLN
September 11, 2015	E-mail to GC re Schoolcraft timeline	0.10	JLN
September 12, 2015	Continued working on Lamstein cross-x	4.25	JLN
September 12, 2015	T/c w/ AS & LS re: pros and cons of settlement, risks of verdict, impact on disability pension & ability to still have trial against medical defendants	1.4	JLN
September 13, 2015	Continued working on Lamstein cross-x	2.8	JLN
September 14, 2015	E-mail from Scheiner cannot speak today - but can tomrorrow	0.1	JLN
September 14, 2015	E-mail to Scheiner from NS re: setting up time to speak	0.1	JLN
September 15, 2015	Continued working on Lamstein cross-x	3.2	JLN
September 15, 2015	T/c with NS re: conversation w/ Scheiner	0.4	JLN
September 15, 2015	Reviewed NS settlement memo to client	0.2	JLN
September 15, 2015	E-mail from NS re: Draft version of JPTO & extending dates to respond to MIL's	0.1	JLN
September 15, 2015	E-mail from Scheiner to NS & JN re: setting time to speak re: settlement	0.1	JLN
September 15, 2015	Sent GC more cross outlines for review	0.10	JLN
September 16, 2015	Review of NS cross examination outlines; notes re: same	1.40	JLN
September 16, 2015	T/c with GC & NS re: settlement status	0.7	JLN
September 16, 2015	Review of new Rule 68 offer	0.50	JLN
September 16, 2015	Review of NS memo to Schoolcraft re settlement	0.30	JLN
September 16, 2015	E-mail w NS re memo and settlement	0.20	JLN
September 16, 2015	Review of NS e-mail to Schoolcraft re settlement	0.10	JLN

TOTAL HOURS

1451.85

TOTAL BILL	1451.85 x \$600.00	\$871,110.00
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**ADRIAN SCHOOLCRAFT vs. CITY OF NEW YORK****10 CV 6005**

<b>ADRIAN SCHOOLCRAFT DISBURSEMENTS FOR NORINSBERG LAW FIRM</b>							
<b>Description of Services</b>	<b>Date</b>	<b>Amount</b>					
Aetna Judicial Services	8/17/2010	\$1,595.00					
Western Union for Schoolcraft (travel NYC)	7/6/2010	\$212.00					
Hampton Inns (NYC)	7/7/2010	\$300.70					
J & R Music World (3 250 gb Hard drives and case)	9/14/2010	\$232.95					
J & R Music World (1tb gb Hard drive)	9/20/2010	\$72.48					
Staples (8gb USB Flash Drive)	9/27/2010	\$33.76					
Off The Page Creations www.schoolcraftjustice.com	10/4/2010	\$110.00					
Off The Page Creations www.schoolcraftjustice.com	10/15/2010	\$60.00					
Staples	10/22/2010	\$38.10					
Staples (8gb USB Flash Drive)	10/25/2010	\$21.76					
Off The Page Creations www.schoolcraftjustice.com	11/4/2010	\$581.40					
Off The Page Creations www.schoolcraftjustice.com	11/4/2010	\$570.00					
Quality Imaging	5/11/2011	\$16.33					
Quality Imaging	5/11/2011	\$2.72					
Staples (4gb USB Flash Drive)	8/15/2011	\$54.38					
Quality Imaging	10/18/2011	\$252.92					
Quality Imaging	11/14/2011	\$7.08					
Quality Imaging	12/7/2011	\$317.48					
Quality Imaging	12/19/2011	\$11.28					
Quality Imaging	12/21/2011	\$5.44					
Cosmopolitan Hotel	1/6/2012	\$208.91					
Quality Imaging	1/12/2012	\$262.50					
Quality Imaging	2/9/2012	\$2.72					
Meridan Investigations	2/28/2012	\$680.00					
Quality Imaging	3/1/2012	\$31.46					
Western Union for Schoolcraft (travel NYC)	3/14/2012	\$329.00					
Quality Imaging	3/15/2012	\$106.92					
Quality Imaging	3/22/2012	\$272.67					
Quality Imaging	3/26/2012	\$55.53					
Quality Imaging	3/26/2012	\$55.53					
Quaility Imaging	4/4/2012	\$341.54					



**ADRIAN SCHOOLCRAFT vs. CITY OF NEW YORK****10 CV 6005**

Quaility Imaging	4/9/2012	\$890.27					
Yudelka Cepeda (cash advance for travel to nyc)	4/10/2012	\$300.00					
Federal Express	4/11/2012	\$28.96					
Meridan Investigations	4/23/2012	\$365.00					
Federal Express	6/4/2012	\$29.08					
Federal Express	9/17/2012	\$21.74					
Federal Express	10/1/2012	\$18.73					
Hotel Albany (room for plaintiff/rental of conference room)	8/9/2012	\$764.56					
Veritext 50%	3/31/2015	\$2,550.92					
Quality Imaging	8/12/2015	\$34.95					
Quality Imaging	8/19/2015	\$15.57					
Quality Imaging	8/25/2015	\$8.17					
Quality Imaging	8/31/2015	\$42.35					
Quality Imaging	8/28/2015	\$438.98					
Quality Imaging	8/28/2015	\$70.66					
Quality Imaging	8/28/2015	\$257.71					
Quality Imaging	8/28/2015	\$3.48					
Quality Imaging	9/9/2015	\$5.44					
Quality Imaging	2/10/2015	\$153.80					
Quality Imaging	9/9/2015	\$5.44					
Quality Imaging	9/16/2015	\$2.72					
Quality Imaging	9/25/2015	\$444.97					
Quality Imaging	9/25/2015	\$202.29					
Quality Imaging	9/25/2015	\$70.01					
Quality Imaging	9/25/2015	\$320.64					
Quality Imaging	9/25/2015	\$2.72					
Quality Imaging	2/18/2015	\$52.15					
Quality Imaging	2/18/2015	\$7.08					
Quality Imaging	2/18/2015	\$20.69					
Quality Imaging	2/19/2015	\$40.72					
Quality Imaging	2/19/2015	\$19.16					
Quality Imaging	2/23/2015	\$235.01					
Quality Imaging	2/23/2015	\$185.85					
Quality Imaging	2/24/2015	\$2.72					
Quality Imaging	2/25/2015	\$2.72					
Quality Imaging	3/2/2015	\$40.50					
Quality Imaging	3/2/2015	\$14.81					
Quality Imaging	3/6/2015	\$65.76					
Quality Imaging	3/9/2015	\$13.50					
Quality Imaging	3/12/2015	\$100.38					
Quality Imaging	3/17/2015	\$159.18					
Quality Imaging	3/18/2015	\$5.44					
Quality Imaging	3/23/2015	\$14.70					

**ADRIAN SCHOOLCRAFT vs. CITY OF NEW YORK****10 CV 6005**

Quality Imaging	3/27/2015	\$10.89					
Quality Imaging	3/27/2015	\$2.72					
Quality Imaging	3/27/2015	\$9.91					
Quality Imaging	3/30/2015	\$2.72					
Quality Imaging	3/31/2015	\$46.49					
Quality Imaging	4/1/2015	\$11.38					
Quality Imaging	4/2/2015	\$13.28					
Quality Imaging	4/2/2015	\$7.08					
Quality Imaging	4/7/2015	\$5.44					
Quality Imaging	4/15/2015	\$14.81					
Quality Imaging	4/17/2015	\$2.72					
Quality Imaging	5/5/2015	\$2.72					
Quality Imaging	6/17/2015	\$8.17					
Quality Imaging	7/7/2015	\$5.99					
Quality Imaging	9/9/2015	\$5.44					
Total		\$15,021.85					
		\$5,000.00	(Rec'd by Gilbert & Levine upon transfer of file)				
		\$10,021.85					

[illegible]



<b>Schoolcraft</b>	<b>Billing Entries for Nicole Bursztyn (Senior Paralegal)</b>		
<b>DATE</b>	<b>ACTIONS</b>	<b>TIME</b>	
June 25, 2010	Saved retainer signed by client to file	0.1	NB
June 25, 2010	Prepared Substitution of Attorney for taking case over from JM	0.2	NB
June 28, 2010	Downloaded documents from new client Adrian Schoolcraft from CD to computer file	0.2	NB
June 28, 2010	Faxed Substitution of Attorney to Jonathon Moore; mailed same via regular mail	0.2	NB
June 28, 2010	Saved Witness Summary of Eddie Valasquez to client file	0.1	NB
June 28, 2010	E-mailed Substitution of Attorney and Signed retainer Agreement to JLN	0.1	NB
June 28, 2010	Saved additional witness information to client file	0.1	NB
July 1, 2010	Calendared JLN meeting with Justice Dept. re: Schoolcraft	0.1	NB
July 12, 2010	Went through documents from CD Schoolcraft's provided; watched videos & recordings & prepared digest of same	4.1	NB
July 13, 2010	Listened to recording b/w AS & Det. Peterson on Sept. 13, 2009 and made notes regarding same	0.40	NB
July 13, 2010	Continued review of Schoolcraft recordings; prepared digest of same	4.20	NB
July 13, 2010	Examined FDNY PCR for AS; prepared summary of same	0.50	NB
July 13, 2010	Reviewed recording of conversations b/w AS & Lt. Mascot on Feb. 20, 2009; prepared digest of	0.60	NB
July 14, 2010	Continued reviewing CD recordings (2008 roll calls) and prepared digest of same	3.6	NB
July 15, 2010	Continued reviewing Schoolcraft roll calls (2009 roll calls); prepared digest of same	3.10	NB
August 10, 2010	Filed Summons and Complaint; sent s&c to as Aetna Judicial for service	0.6	NB
August 11, 2010	Saved witness information to client file	0.1	NB
August 11, 2010	Began review of new CD from Client w/ numerous additional recordings and docs	3.90	NB
August 18, 2010	E-mailed JLN schoolcraft audio files	0.1	NB
August 19, 2010	Filed Affidavit of Service as to Frederick Sawyer	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Jamaica Hospital Medical Center	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Steven Mauriello	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Christopher Broschart	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Timothy Caughey	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Michael Marino	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Shantel James	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Theodore Lauterborn	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Lillian Aldana-Bernier	0.1	NB
August 30, 2010	Filed Affidavit of Service as to Isak Isakov	0.1	NB
August 30, 2010	Filed Affidavit of Service as to defendant Gerald Nelson	0.1	NB
August 31, 2010	Saved AS personal information to file	0.1	NB
September 13, 2010	Filed Amended Complaint	0.3	NB
September 16, 2010	Reviewed AS hospital records to locate discharge summary; sent JLN same	0.2	NB
September 17, 2010	Printed Judge Weinstock opinion re: Velez proceedings for JLN review	0.1	NB
September 18, 2010	Printed NYPD Admin Guide provided by AS for JLN review	0.15	NB
October 8, 2010	Email correspondence w/ GC re: more recordings	0.1	NB
October 12, 2010	Printed JHMC MTD for JLN; bound same	0.15	NB

October 20, 2010	Viewed AS hospital records to find ER notes for JLN; sent JLN same	0.2	NB
October 27, 2010	Filed Affidavit of Service as to defendant The City of New York	0.1	NB
October 27, 2010	Filed Affidavit of Service as to defendant Theodore Lauterborn	0.1	NB
October 27, 2010	Filed Affidavit of Service as to defendant Christopher Broschart	0.1	NB
October 27, 2010	Filed Affidavit of Service as to defendant Steven Mauriello	0.1	NB
October 27, 2010	Filed Affidavit of Service as to defendant Timothy Caughey	0.1	NB
October 27, 2010	printed and saved answer into computer file and hard file	0.1	NB
October 27, 2010	Filed Affidavit of Service as to defendant Isakov	0.1	NB
October 27, 2010	Filed Affidavit of Service as to defendant Jamaica Hospital Medical Center	0.1	NB
November 16, 2010	Sent AS e-mail enclosing Affidavit	0.1	NB
November 17, 2010	Formatted First Request for Admissions, request for discovery demands, request for interrogatories and sent same to JLN for review	1.2	NB
December 9, 2010	Drafted letter to all counsel enclosing opposition to MTD	0.25	NB
December 10, 2010	Prepared AS authorizations for Jamaica Hospital and sent same to all counsel	0.7	NB
December 10, 2010	Filed Affidavit of Service for Gough and Duncan	0.1	NB
December 10, 2010	Prepared attorney list of all defense counsel in case and saved to file	0.2	NB
December 15, 2010	Filed Affidavit of Service as to defendant Kurt Duncan	0.1	NB
February 9, 2011	Formatted Ltr. Opposing Defendants' Request Stay pending MTD; made multiple edits and filed same with Court	0.6	NB
March 4, 2011	Prepared authorization and letter enclosing authorization to ACC	0.25	NB
May 6, 2011	Printed Judge Sweet's decision on defendants' MTD for JLN review	0.2	NB
May 9, 2011	Drafted Deposition notices for all defendants	0.1	NB
May 10, 2011	E-mailed JLN Opinion of Judge Sweet	0.1	NB
May 10, 2011	Formatted initial disclosures for City of New York; created litigation backs; prepared documents to sent with disclosures; copied same to for all parties; prepared letter enclosing said documents; sent to all parties via regular mail	1.4	NB
May 13, 2011	Prepared and sent authorization for NYC employment records to Martin Clearwater and Bell	0.5	NB
May 15, 2011	Formatted final draft RFA for City of New York; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	1.2	NB
May 20, 2011	Formatted final draft of 1st Document Demands for City; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	0.8	NB
May 20, 2011	Formatted final draft of Rogs for City; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	0.7	NB
May 20, 2011	Formatted final draft of Deposition Notices for City Defendants; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	0.4	NB
May 24, 2011	Formatted final draft of discovery demands/ Rogs for JHMC; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	1.7	NB

May 25, 2011	Formatted final draft of Deposition Notices for JHMC Defendants; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	0.5	NB
June 16, 2011	Sent AS authorization to Queens DA	0.2	NB
June 23, 2011	Prepared authorization and letter enclosing authorization to Queens DA	0.25	NB
July 8, 2011	Drafted letter to all counsel notifying them of pre-trial conference; made edits and sent out same	0.25	NB
August 8, 2011	Downloaded and printed research received from JLN	0.1	NB
December 13, 2011	Sent AS Authorization to James Liander (Queens DA)	0.2	NB
December 13, 2011	Letter to defense counsel enclosing responses to discovery requests (authorizations)	0.2	NB
December 13, 2011	Letter to Callon enclosing Luell and IRS Authorization	0.2	NB
January 5, 2012	Made reservation for Schoolcrafts for Cosmopolitan Hotel	0.1	NB
January 11, 2012	Sent Callan letter and AS authorization via regular mail and e-mail	0.1	NB
January 23, 2012	Letter to Greg Radomisli enclosing auths for medicaid records and disclosing lost earnings	0.25	NB
February 10, 2012	E-mail exchange to Jeremy Stephens regarding serving subpoenas on Johnstown PD, FCSD and FCDSS	0.2	NB
March 9, 2012	Formatted to Lt. Gilbo regarding the documents that were sent in response to subpoena and sent same	0.25	NB
March 13, 2012	Formatted letter and made edits to letter to Court re: leaks to media	0.3	NB
March 14, 2012	Pulled and emailed GC various documents from Schoolcraft file	0.2	NB
April 16, 2012	E-mail exchange to Jeremy Stephens (investigator) regarding serving subpoenas on Vallone and Kelly	0.2	NB
April 23, 2012	Sent package to all counsel enclosing transcripts of Browne, Pichardo, McHugh, Polanco, Mauriello, Herran, Gianelli, Esposito	0.8	NB
May 11, 2012	Prepared follow up letter to Gilbo subpoenaing records for JPD; sent same via regular mail	0.25	NB
May 17, 2012	Sent Schoolcraft Affidavit to GS as per JLN	0.1	NB
August 14, 2012	Prepared letter and authorization for the release of tax records to Publiker; sent same via mail and e-mail	0.25	NB
August 28, 2012	Email to all counsel enclosing documents received in response to various non-party subpoenas	0.15	NB
August 28, 2012	Copied, sorted and catalogued various non party subpoenas (County of Fulton, Johnstown PD for each defendant); drafted and sent letter to all counsel enclosing same via mail	0.45	NB
September 11, 2012	Formatted and made edits to JLN letter to Court requesting 120 day extension of time; filed same with Court	0.6	NB
October 1, 2012	Multiple phone calls to Hotel Albany regarding setting up conference room for meeting with AS	0.6	NB
October 2, 2012	Forwarded schoolcraft justice website to JJM	0.1	NB
October 12, 2012	Drafted and sent letter to City requesting color copies of photographs shown at plaintiff's deposition	0.3	NB
October 12, 2012	email exchange with S. Publiker regarding City's consent	0.2	NB
October 16, 2012	Emailled Mauriello letter to Judge to JLN	0.1	NB
October 18, 2012	Drafted letter regarding additional day of testimony for AS deposition and sent to GC and JF for review	0.2	NB
October 21, 2012	Filed Second Amended Complaint	0.6	NB



November 13, 2012	newly identified defendants; emailed JLN regarding same	0.2	NB
November 14, 2012	Scanned and e-mailed AS Letter of Termination in file; filed same in computer file and hard file	0.25	NB
November 15, 2012	Made changes and formatting edits to letter to Judge Sweet regarding being relieved as counsel and filed same with Court	0.6	NB
January 29, 2015	Read deposition transcript of Mauriello; digested same	2.4	NB
February 3, 2015	Printed Amended Complaint and Docket sheet for JLN review	0.1	NB
February 3, 2015	Downloaded and printed all memorandums of law filed by defendants	0.6	NB
February 5, 2015	Read deposition transcript of Bernier; digested same	1.9	NB
February 6, 2015	Read deposition transcript of Cooper; digested same	1.3	NB
February 9, 2015	Read deposition transcript of Finnegan; digested same	1.1	NB
February 11, 2015	Read deposition transcript of Caughey; digested same	1.7	NB
February 12, 2015	Read deposition transcript of Duncan; digested same	0.6	NB
February 13, 2015	Printed various exhibits from Plaintiff's deposition	0.2	NB
February 18, 2015	Printed and bound depositions of Mauriello and Valenti	0.2	NB
February 19, 2015	Read deposition transcript of Dhar; digested same	0.6	NB
February 19, 2015	same	1.6	NB
February 19, 2015	Printed various exhibits from depositions of Mauriello, Lauterborn and Floyd	0.2	NB
February 25, 2015	Read deposition transcript of Ferrara; digested same	1.2	NB
February 25, 2015	same	0.4	NB
February 25, 2015	Read deposition transcript of Hanlon; digested same	0.4	NB
March 3, 2015	E-mailed Marino deposition to JLN	0.1	NB
March 9, 2015	Printed Plaintiff's Rule 56.1 Statement for JLN to review	0.1	NB
March 11, 2015	same	1.8	NB
March 12, 2015	Read deposition transcript of James; digested same	0.75	NB
March 12, 2015	Printed and bound documents from City of New York from City of New York and Mauriello medical documents	0.2	NB
March 18, 2015	Read deposition transcript of Lamstein; digested same	1.6	NB
March 20, 2015	Read deposition transcript of Lauterborn; digested same	2.1	NB
March 23, 2015	Downloaded, printed and bound second set of filings by all defendants for JLN to review	0.4	NB
March 23, 2015	Printed Huffman QAD for JLN	0.1	NB
March 25, 2015	Read deposition transcript of Silverman; digested same	0.6	NB
March 25, 2015	Printed, reviewed and signed confidentiality agreement for myself; had JLN review and sign same	0.2	NB
March 25, 2015	E-mailed Confidentiality agreement to Merry Soetanto signed by JLN and myself	0.1	NB
March 27, 2015	Converted Schoolcraft opening statement to MS Word	0.1	NB
March 30, 2015	Printed IAB Documents for JLN; bound & collated same	0.4	NB
March 31, 2015	Printed and bound Caughey and Weiss Interviews	0.2	NB
April 1, 2015	Printed and bound exhibit list and witness list for Court	0.2	NB
April 1, 2015	Printed depositions of Huffman, James, Hanlon, Halpren, Gough, Ferrara, Duncan, Caughey, Broschart, Bernier and bound	0.7	NB

April 1, 2015	Compiled, sorted, copied and collated multiple trial exhibits	0.6	NB
April 2, 2015	Printed, collated and bound AS direct outline	0.2	NB
April 8, 2015	Read deposition transcript of Lwin; digested same	1.6	NB
April 9, 2015	Read deposition transcript of Marino; digested same	1.8	NB
April 13, 2015	Printed crime reporting review documents	0.2	NB
April 14, 2015	Read deposition transcript of Patel; digested same	1.1	NB
April 15, 2015	Read deposition transcript of Sangenti; digested same	0.6	NB
April 16, 2015	Read deposition transcript of AS; digested same	3.1	NB
April 16, 2015	Read deposition transcript of AS (Volume II); digested same	2.9	NB
April 16, 2015	Read deposition transcript of AS (Volume III); digested same	2.5	NB
April 17, 2015	Read deposition transcript of LS; digested same	1.4	NB
April 27, 2015	Read deposition transcript of Trainor; digested same	0.4	NB
April 27, 2015	Read deposition transcript of Valenti; digested same	1.1	NB
April 28, 2015	Read deposition transcript of Weiss; digest same	1.3	NB
May 1, 2015	Read deposition transcript of Broschart; digest same	2.1	NB
May 4, 2015	Read deposition transcript of Duncan; digested same	0.7	NB
May 5, 2015	Read deposition transcript of Sawyer; digested same	0.8	NB
May 6, 2015	Read deposition transcript of Marquez; digested same	0.6	NB
May 13, 2015	Read deposition transcript of Purpi; digested same	0.75	NB
May 13, 2015	Calendared dates for JPTO, MIL, Jury Charge, Voir Dire,	0.1	NB
June 2, 2015	Read deposition transcript of Milone; digested same	0.75	NB
June 2, 2015	Read deposition transcript of Carrasco; digested same	0.9	NB
June 4, 2015	same	0.6	NB
June 5, 2015	Read deposition transcript of Halpren-Ruder; digested same	0.8	NB
June 5, 2015	Read deposition transcript of Lubit; digested same	1.1	NB
June 17, 2015	Printed and emailed defendants memoranda of law for reconsideration for JLN	0.2	NB
June 17, 2015	emailed defendants memoranda of law for reconsideration to AS	0.1	NB
August 5, 2015	Printed City's draft JPTO	0.1	NB
August 6, 2015	JPTO	0.1	NB
August 10, 2015	Made multiple formatting changes to final S&C; prepared civil cover sheet and summons for same	0.7	NB
August 11, 2015	Printed, collated and stapled multiple discovery documents from City sent to JLN via email	0.2	NB
August 13, 2015	Printed spreadsheet from A. Scheiner with City's objections to plaintiff's JPTO	0.1	NB
August 25, 2015	Printed JPTO for JLN review	0.1	NB
August 25, 2015	Printed filing by NS responding to various arguments by defendants on JPTO exhibits and witnesses for JLN Review	0.1	NB
August 25, 2015	Printed, bound, sorted and tabbed Lauterborn Cross	0.6	NB
August 25, 2015	Printed, bound, sorted and tabbed Marino Cross	0.8	NB
August 25, 2015	Printed, bound, sorted and tabbed Carter Cross	0.5	NB
August 25, 2015	Printed, bound, sorted and tabbed Weiss Cross	0.6	NB
August 25, 2015	Printed, bound, sorted and tabbed Mauriello Cross	0.8	NB
August 31, 2015	Printed Amended Complaint and emailed to JLN	0.1	NB
September 3, 2015	Printed City letter re: JPTO schedule for JLN review	0.1	NB
September 5, 2015	Prepared Schoolcraft Trial Folder	0.2	NB

September 5, 2015	Gathered and Prepared Folder of Supplies for Schoolcraft Trial	0.25	NB
		103.15	

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